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United States District Court
Northern District of Illinois

R. JULKA)
R.J. (MINOR, SON))
A.J. (MINOR, SON))
)
PLAINTIFFS)

FILED
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THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

v.

1)BUTLER ILLINOIS SCHOOL DISTRICT #53
2)BOARD OF EDUCATION FOR BUTLER ILLINOIS SCHOOL DISTRICT #53
3.HEIDI A. WENNSTROM
(IN HER PERSONAL AND OFFICIAL CAPACITY)
4. KELLY VOLIVA
(IN HER PERSONAL AND OFFICIAL CAPACITY)
5. ALAN HANZLIK
(IN HIS PERSONAL AND OFFICIAL CAPACITY)
6. ALAN KUMAR
(IN HIS OFFICIAL CAPACITY))
7. LIZ CHUN)
(IN HER OFFICIAL CAPACITY))
8. LOU PASKALIDES)
(IN HIS OFFICAL CAPACITY))
9. RAJIV ADVANI)
(IN HIS OFFICIAL CAPACITY))
10. TODD RUSTENBERG)
(IN HIS OFFICIAL CAPACITY))
11. HITESH PATEL)
(IN HIS OFFICIAL CAPACITY))
12. CAROLINE ROSELLI)
13. LIBBY N. MASSEY)
14. ATTORNEY DOE)

1:17-cv-02849
Judge Matthew F. Kennelly
Magistrate Judge Susan E. Cox

DEFENDANTS

COMPLAINT

I.
NATURE OF ACTION AND JURISDICTION

1. This is a civil action under 42 U.S.C § 1983, seeking damages and injunctive relief against Defendants listed below, for committing acts, under color of law, with the intent and purpose of:

    a. depriving Plaintiffs of their rights secured under the Constitution, laws of the United States, and the State of Illinois, including under the 5th, 6th, 8th, and 14th Amendments

    b. depriving Plaintiffs of their Federal and State Due Process rights

    c. depriving Plaintiffs of their rights under the Defendant School District's Uniform Grievance Policy (UGP)

    d. taking or causing retaliatory actions against Plaintiffs for their exercise of Constitution-protected Due Process rights

    e. refusing or neglecting to prevent such deprivations and denials to Plaintiffs

    f. not taking corrective action to cure these violations and for committing other acts which harmed and injured Plaintiffs, including Child Abuse and malpractice.

2. This case arises under the United States Constitution, 42 U.S.C §§ 1983 and 1988, as amended. This Court has jurisdiction in this matter pursuant to 28 U.S.C. §§ 1331 and 1343. The declaratory and injunctive relief sought is authorized by 28 U.S.C. §§ 2201 and 2202, 42 U.S.C. § 1983 and Rule 57 of the Federal Rules of Civil Procedure, and pursuant to the Court's ancilliary and supplemental jurisdiction, this Court has jurisdiction over Plaintiff's related State and common law claims and venue of the named Defendants is proper under 28 U.S.C. § 1391.

3. Plaintiffs bring this action to redress the violations of their rights and for damages for the injuries they sustained, as a result of, the following:

    a. Violation of Plaintiffs' Federal and State Due Process rights as per the 5th and 14th Amendments of the United States Constitution, in both facets of Due Process (Procedural Due Process and Substantive Due Process)

    b. Violation of Plaintiffs' protection against Cruel and Unusual Punishment as per the 8th Amendment of the United States Constitution

    c. Violation of Plaintiffs' rights to an impartial jury, to be confronted with the witnesses against them, to have compulsory process for obtaining witnesses in their favor, and to have assistance of counsel for their defense as per the 6th Amendment of the United States Constitution

d. Taking or causing retaliatory actions for Plaintiffs' exercising Due Process rights

e. Violation of Plaintiffs' rights against compelled self-incrimination as per the 5th Amendment of the United States Constitution

f. Infliction of emotional child abuse on a minor child through interrogation

g. Violation of a child's rights to equal opportunity education in a safe, positive, non-punitive, non-hostile environment, protected from discrimination

h. Educators' and attorneys' malpractice with conspiracy to violate Plaintiffs' rights

i. Members of Board of Education intentionally and with reckless disregard failing to fulfill their obligations to investigate Plaintiffs' grievance and take measures to protect Plaintiffs from unnecessary harm.

II.
THE PARTIES

4. Plaintiff and his biological sons, R.J. and A.J, reside with his wife and their biological mother, at 717 St. Joseph's Drive, Oak Brook, IL, 60523, in DuPage County, which is within this Court's territorial jurisdiction. At the beginning of the events pertinent to this Complaint, plaintiff's son R.J. was 11 years old (5th grade), and son A.J. was 9 years old (4th grade). Plaintiff is also acting on behalf of his minor sons as their lawful guardian and representative. They are the parties adversely affected by the Defendants' actions and decisions, and therefore are properly before this Court.

5. Defendant "Butler School District #53" is a local governmental entity that provides educational services pursuant to and in accordance with the requirements and standards imposed by Federal and State law to elementary and middle school children, who are residents of the village of Oak Brook, IL. The school district receives Federal and State education funds. The principal place of business, offices, and facilities are at 2801 York Rd., Oak Brook, IL, 60523. The Defendant named above will be commonly referred to as "the School District" or "the District" in this Complaint.

6. Defendant "Board of Education of Butler School District #53" is a local public agency acting under color of State law in charge of and managing the Butler School District #53, to provide public education to elementary and middle school

children living in District #53. The board receives Federal and State education funds. The principal place of business, offices, and facilities are at 2801 York Rd., Oak Brook, IL, 60523. Defendants Alan Hanzlik, Alan Kumar, Liz Chun, Lou Paskalides, Rajiv Advani, Todd Rustenberg, and Hitesh Patel, were at all times a) relevant to the events complained of, b) the duly elected members of the Defendant Board, and c) acting under color of State law. Defendant Alan Hanzlik was and is the President of the Defendant Board. The actions and decisions complained of in this Complaint, taken by the above named Defendants, took place within DuPage County, IL, within the geographic boundary of this Court, and are thus subject to this Court's jurisdiction. The Defendants named above will be commonly referred to respectively as "the Board", or as "the School Board" in this Complaint.

7. Defendant Heidi Wennstrom was and is the Superintendent of the Defendant School District, and Defendant Kelly Voliva was at all relevant times, the Principal of Brook Forest Elementary School of the Defendant School District. Ms. Voliva resigned her position in August 2016. The actions which are the subject of the claims against both Defendants occurred in Oak Brook, IL, in the Defendant School District. The offical address for both Defendants at all relevant times was that of the School District, at 2801 York Road, Oak Brook, IL, 60523. All actions and decisions which are the subject of this Complaint re: the above defendants took place within the geographic boundaries of this Court, and they are thus subject to this Court's jurisdiction. Defendants Wennstrom and Voliva, at all times relevant to the matters in dispute, acted under color of State law.

8. Defendant Libby Massey, at all times relevant to this Complaint, was employed as an Attorney with the law firm of Robbins Schwartz, with offices at 55 West Monroe St, Suite #800, Chicago, IL, 60603-5144. Defendant Massey's actions took place in both Cook and DuPage Counties, in IL, which are in this Court's jurisdiction. Defendant Massey wrongfully assumed the task of being the School District's UGP independent, impartial attorney Complaint Investigator to assist and supplement Plaintiffs' grievance, to impartially, independently, equitably, and competently investigate and report the facts pertaining to Plaintiffs' UGP grievance re: the findings and punitive actions made and imposed on Plaintiffs by Defendant Wennstrom on February 8, 2016. In fulfilling her obligations as Complaint Investigator, she acted under color of State law. Defendant Massey, however, as subsequently learned, was employed by the law firm of Robbins Schwartz, that provided counsel and assistance to Defendants Wennstrom, Voliva, and School Board respecting the investigation, adverse findings, and actions taken against Plaintiffs, and was acting as the Defendants School District's, School Board's, Wennstrom's, and Voliva's attorney. This dual role was not disclosed on February 18, 2016, when Defendant Massey notified Plaintiff and biological mother that she had been assigned to be the School District UGP's Complaint Investigator.

9. Defendants Caroline Roselli and Attorney Doe, at all times relevant to this Complaint, were employed as Attorneys with the law firm of Robbins Schwartz, with offices at 55 West Monroe St, Suite #800, Chicago, IL, 60603-5144, and represented the School Defendants as their attorneys in the matters which are the subject of this action. Defendant Roselli represented and provided counsel to the Defendants School Board, Wennstrom, and Voliva during and after Defendant Wennstrom's initial investigation of and findings of academic dishonesty she made against Plaintiffs. Defendant Wennstrom on multiple occasions reported that Defendant Roselli guided her throughout the investigative process, and gave her input re: investigative findings and the sanctions which were handed down on February 8, 2016 to Plaintiff and biological mother. Defendant Roselli worked with Defendant Massey to protect the Defendants Wennstrom, Voliva, Hanzlik, and School Board, in a conspiracy with Defendants Hanzlik, Wennstrom, Voliva, and Massey, in violation of Plaintiffs' Constitutional and State law rights. Defendant Attorney Doe is the Robbins Schwartz attorney who authorized, supervised, and approved the work of Defendants Massey and Roselli. These Defendants' actions took place in both Cook and DuPage Counties, in IL, which are in this Court's jurisdiction.

III.
FACTS COMMON TO ALL CLAIMS

10. The National Geographic Bee (GeoB) is an annual geography contest sponsored by the National Geographic Society. It is open to students in the fourth through eight grades from participating elementary and middle schools. The GeoB contest for 2016 was being held the week of January 19, 2016, and Brook Forest Elementary School was a participating school in the GeoB that year.

11. Plaintiff's sons, R.J. and A.J. were both enrolled as participants in the 2016 GeoB exam. In preparation for the exam, both children studied general, publically available materials, including National Geographic atlases, Quizlets, and prior GeoB sample exam questions. Their primary preparation for the exam was given in trust to their maternal uncle, Trushar Patel. It was common for both children to be tutored or instructed by family members, including both paternal and maternal uncles and grandparents, in an effort to assist Plaintiff and his sons' biological mother. To further help the two children prepare, an internet address for the GeoB website (provided to all enrolled students by GeoB school co-ordinator, Jennifer Traub) was accessed EXHIBIT 1. In using the website, an advertised offer on the website to purchase "GeoB materials" was encountered EXHIBIT 2. There was no indication from the website itself or in the payment confirmation email that the materials purchased were anything other than study materials for preparation for the GeoB exam. A purchase of this material was made with the biological mother's credit card EXHIBIT 3. To facilitate collection and collation of the purchased material, an email address which was to be used for a study group was given and Mr. Patel gave his home address for any hard copy material that needed

to be sent. The National Geographic Society then performed a background/security check prior to approving the purchase EXHIBIT 4.

12. On Friday, January 15, 2016, the two children's biological mother contacted by telephone Dr. Vandana Badlani, to invite her to a study group with her two children. This was a common occurrence both with many families in the community, as well as between the Julka and Badlani children. The study session was to be in preparation for the GeoB exam, which Dr. Badlani's two children were also enrolled in. The mother of R.J. and A.J. offered to share the purchased GeoB materials with the children of Dr. Badlani at the study session. Dr. Badlani then proceeded to question the children's biological mother re: the nature and content of the purchased GeoB material. The children's biological mother then read several of the questions in the GeoB material to Dr. Badlani, who subsequently became irate and accused the children's biological mother of being in possession of the 2016 GeoB exam questions. The children's biological mother refuted this claim, stating that the material was bought off the GeoB website given out by the school, and how did Dr. Badlani know that the questions were from the actual 2016 exam. Dr. Badlani did not offer an explanation, but threatened to report the biological mother of R.J. and A.J. to the school.

13. The biological mother of R.J. and A.J. contacted the Plaintiff after her conversation with Dr. Badlani, and recounted the events of the conversation to the Plaintiff, who was at work. The Plaintiff stated that he would further discuss the matter with her once he returned from work in the evening. Later that night, after discussing the events between themselves, Plaintiff and the biological mother of R.J. and A.J. decided that if there was any chance that the GeoB material purchased online was actually the 2016 exam questions, then it would be the ethical and proper thing to do to remove R.J. and A.J. from the GeoB competition. An email EXHIBIT 5 was sent that night of January 15, 2016 to the school GeoB co-ordinator, Jennifer Traub, telling her that both children were withdrawing from the GeoB test.

14. In the early morning of Saturday, January 16, 2016, another phone conversation was held between the biological mother of R.J. and A.J., and Dr. Badlani. This phone conversation lasted 31 minutes, and was described by the biological mother as heated, intense, and very choppy. The opinion of the biological mother was that Dr. Badlani was intent on blaming her for purchasing the purported 2016 GeoB exam questions, and continually attempted to question the biological mother in an attempt to get her to admit to trying to cheat on the GeoB test. The biological mother again re-iterated that the GeoB material was from the offical website, and that she had no way of knowing if the questions were legitimately the 2016 GeoB exam questions. She asked Dr. Badlani that why would she offer the material to others if it was the exam questions, and once again asked Dr. Badlani how she knew what the 2016 GeoB exam questions were. Dr. Badlani again avoided and evaded answering the question. Of note, the biological mother did hear Dr.

Badlani's husband, Dr. Ravi Badlani, yelling angrily in the background as he listened to the responses of his wife to the biological mother.

15. At 8:00 a.m. on Tuesday, January 19, 2016, the biological mother went to Brook Forest Elementary School to self-report to the principal, Defendant Voliva, that there may have been an issue with purchase of GeoB material from the GeoB website, and that Dr. Badlani was claiming that the material purchased was the authentic exam for 2016. Tuesday, January 19, 2016 at 8:00 a.m. was the first available time and day for the biolgical mother to discuss this matter with Defendant Voliva, as the day prior was a federally observed holiday for Martin Luther King, the school was closed, and she did not have Defendant Voliva's personal phone number. On seeing Defendant Voliva in the school office, the biological mother stated to Defendant Voliva that she wanted to talk to her about the GeoB exam, and she was told by Defendant Voliva to hold on for a little bit.

16. The second subsequent meeting was held in Defendant Voliva's office. Defendant Voliva was present as well as Defendant Wennstrom. Dr. Vandana Badlani was also present. Defendants Wennstrom and Voliva then asked a series of questions to the biolgical mother re: the events that had occurred, and accused her of attempting to cheat on the GeoB exam. The biological mother answered each question given to her, and explained the sequence of events that led up to the purchase of the GeoB material, including the involvement of her brother, Mr. Patel, as instructor to R.J. and A.J. The biolgical mother was questioned by Defendants Wensstrom and Voliva re: the email and mailing addresses used to purchase the GeoB material. The biolgical mother explained that an email address to be provided to the other participating parents to upload any additional material, links or pictures of the event once the event had taken place, was used for the material purchase, and the mailing address was that of Mr. Patel. Defendant Wennstrom told the biological mother that she did not believe her that Mr. Patel lived at that address. The biological mother was then subjected to verbal attacks by Dr. Badlani, and further disparaging remarks by Defendants Wennstrom and Voliva. The biolgical mother was then asked to leave the school property, and was walked to her car by Defendant Wennstrom, who told her how disappointed she was in the biological mother.

17. No further discussion, questioning, or contact was made by Defendant Wennstrom or Defendant Voliva with the biolgical mother after the meeting in Defendant Voliva's office, until February 8, 2016. Until this point, there had been no discussion with or communication/contact between Plaintiff and Defendant Wennstrom or Voliva. On February 1, 2016, Defendant Wennstrom planned an interrogation of R.J. by Defendant Voliva and assistant principal Lisa Owen, in an attempt to get R.J. alone in a room with two authority figures, without parental representation. At no time were Plaintiff or biological mother aware of this meeting or agree to it. Defendant Wennstrom instructed Defendant Voliva and assistant prinicpal Lisa Owen on what exact questions to ask R.J. so as to lead an 11 year old boy to answers which would confirm what she wanted EXHIBIT 6.

Included in those questions were statements designed to interrogate R.J. about the Wordmasters competition, which Defendant Wennstrom already knew had cleared the Plaintiff and biological mother of any impropriety. On Tuesday February 2, 2016, the interrogation took place, and afterwards, Defendant Voliva sent an email to Defendant Wennstrom stating that she and assistant prinicpal Lisa Owen had spoken with R.J. and that he had confirmed that he had never seen the GeoB test material, and that when the Plaintiff and biological mother found out that the material may represent the actual exam, that the parents would not let him or A.J. participate in the GeoB test EXHIBIT 7.

18. Between January 15, 2016 and February 8, 2016, multiple events occurred behind the scenes unbeknownst to the Plaintiff, biological mother, or their sons. Dr. Vandana Badlani at some point on Friday, January 15, 2016, after her first conversation with the biological mother of R.J. and A.J., contacted Defendant Wennstrom via personal cell phone to accuse the biological mother of cheating on the GeoB exam by purchasing the exam questions. This conversation was confirmed in person by Defendant Wennstrom to both Plaintiff and biological mother. Defendants Wennstrom and Voliva proceeded to conduct a series of communications with GeoB co-ordinator Jennifer Traub, assistant principal Lisa Owen, and assistant GeoB co-ordinator Brittany Kuethe re: the allegations made by Dr. Vandana Badlani against the biological mother. On Monday, January 18, 2016, Defendant Voliva began contacting other 5^{th} grade teachers at Brook Forest Elementary School in no way related to the GeoB exam (Aubrey Ignace, Ellen Wozny) to appraise them of the situation, for no other discernible reason other than to propogate the accusation of cheating by the biological mother of R.J. and A.J. EXHIBIT 8. On Tuesday, January 19, 2016, Defendants Wennstrom and Voliva contacted Lisa Kennedy, the contact person for another academic exam taken by R.J. and A.J. called Wordmasters, to ask Ms. Kennedy to conduct a cheating investigation into the Plaintiff and biological mother EXHIBIT 9. There was no indication that there was any improprietous actions related to WordMasters by either Plaintiff or biological mother, to warrant this request. The sole reason for requesting this investigation was the disbelief of Defendant Wennstrom that R.J. had received a score of 15 out of 20 on the Wordmasters exam, which she personally felt was too high for a student of R.J.'s stature. Later on Tuesday, January 19, 2016, Lisa Kennedy emailed Defendants Wennstrom and Voliva that there was no evidence of wrong-doing by the Plaintiff or biological mother EXHIBIT 10.

19. On February 8, 2016, three emails from Defendant Wennstrom were received by both Plaintiff and the biological mother EXHIBIT 11, 12, 13. One email described the findings of Defendant Wennstrom's investigation. The second email was Defendant Wennstrom's personal opinion/lecture to Plaintiff and biological mother re: her advice on how to be good parents to R.J. and A.J., implying that Plaintiff and biological mother were not raising R.J. and A.J. appropriately. The third email was a mass email sent to all Butler School District #53 families re: the "extensive investigation" into purported academic dishonesty, effectively

notifying the entire, very small, tight-knit community, that there was a disciplinary issue going on involving an unknown family. As there was no reason as to why the entire Butler School District #53 needed to be notified of the events surrounding allegations of academic dishonesty involving one family, and due to the small size of the community, it was easy to discover that Plaintiff, biological mother, R.J., and A.J. were implicated as the unknown family.

20. In addition, the biological mother had a conversation shortly after release of the emails, with another woman whose child was in the Butler School District #53. This other woman made statements, which she attributed directly to conversing with Dr. Vandana Badlani, to the biological mother that identified that she knew exactly what sanctions and punishments were placed against Plaintiff, biological mother, R.J., and A.J. This is indicative of a serious violation of student privacy re: disciplinary action, and the only way Dr. Vandana Badlani could have known of the sanctions would have been through Defendant Wennstrom. Defendant Wennstrom also sent a separate email to the Parent Teacher Organization (PTO) and Amy Read, the principal of Butler Junior High, District #53's middle school, appraising them of the investigation and how to handle it. As these people were in no way related to the GeoB exam, to appraise them of the situation was for no other discernible reason than to propogate the accusation of academic dishonesty by the Plaintiff, biological mother, R.J., and A.J. Inclusion of the future principal Amy Read for R.J. when he finished 5th grade and entered 6th grade in the fall of 2016, was for the sole reason of having him enter his new school with a tainted repuation, despite having been proven to have done nothing wrong EXHIBIT 14.

21. Defendant Wennstrom also sent a separate email to the entire faculty and staff for both District #53 schools, appraising them of the investigation and how to handle it. As these people were in no way related to the GeoB exam, to appraise them of the situation was for no other discernible reason that to propogate the accusation of academic dishonesty by the Plaintiff, biological mother, R.J., and A.J. Inclusion of all the current and future teachers that R.J. and A.J. would have in their academic career in District #53, was for the sole reason of having both R.J.'s and A.J's reputations tainted, and creating an atmosphere of suspicion and hypervigilance, counter-productive to their educations EXHIBIT 15.

22. The email from Defendant Wennstrom that discussed her "thorough" investigation was one-sided, inaccurate, and contradictory as noted below:

    a. She reported that she met with the biological mother with Defendant Voliva for over two hours. The actual meeting time was closer to an hour, and most of this time was spent with the biological mother and Dr. Vandana Badlani in the room together, which was inappropriate. Her statement that the purchase of GeoB material was to access contest questions in advance of the GeoB was contradicted by the statements by the biological mother, of her own accord, that the purchase was to obtain GeoB material, and did not indicate on the GeoB website that actual test questions were involved. The first time that the biological mother was aware of the possibility of the material containing exam questions was when Dr. Vandana Badlani identied the questions in conversation with the biological mother as authentic and accused her of cheating. Defendant Wennstrom's statement that an email and password was created to register for the material purchase was intended to make it seem that this was a deceptive practice. In fact, it was the biological mother who reported the purchase of material, and she provided the email address on her own. Defendant Wennstrom stated that a false name and address was provided for the registration. The biological mother specifically stated to Defendants Wennstrom and Voliva that the name was that of her brother, Trushar Patel, the uncle given charge of helping R.J. and A.J. in preparation for the GeoB exam, and the address given was Trushar Patel's residence; Defendant Wennstrom chose not to believe the biological mother, despite proof of Trushar Patel's living at that address.

b. Defendant Wennstrom stated that the downloading of the GeoB questions was done under false pretenses by the biological mother, completely ignoring the statements made by the biological mother, of her own accord, that there was no way of knowing that the actual questions used at the school would be available for purchase on a website; again, it was only identified online as "GeoB material". Defendant Wennstrom stated that on January 15, 2016, two friends of the biological mother tried to convince her to withdraw R.J. and A.J. from the GeoB contest. This is a completely untrue statement as Dr. Vandana Badlani did not ask the biological mother to withdraw R.J. and A.J.; she only stated that she might have to report her actions to the school administration. In fact, it was after discussion with the Plaintiff in the evening of Friday, January 15, 2016, after he returned from work, that the decision was made by Plaintiff and biological mother to pull R.J. and A.J. out of the GeoB contest if there was any possibility that the material claimed to be authentic by Dr. Vandana Badlani, was in fact authentic. Defendant Wennstrom stated that on Saturday, January 15, 2016, an email was sent to the GeoB co-ordinator, Jennifer Traub, pulling R.J. and A.J. out of the contest. As shown from prior, the email to Jennifer Traub was sent on Friday, January 15, 2016, not Saturday, which would have been January 16, 2016. In addition, the claim by Defendant Wennstrom that the biological mother pulled R.J. and A.J out of the GeoB contest because biological mother cited a family wedding, was blatantly false; the email withdrawing the children did not give a reason at all for removal of R.J. and A.J., and the family wedding in question was during the weekend after the GeoB contest, with the airline tickets purchased well before the GeoB contest on October 3, 2015 EXHIBIT 16.

c. Defendant Wennstrom stated that on the morning of January 19, 2016, the biological mother contacted Principal Voliva to report poor parent behavior by Dr. Vandana Badlani; this is a false statement as the biological mother went in to the school first thing in the morning to report to Defendant Voliva about the possible unwitting purchase of exam material for the GeoB exam. Defendant Wennstrom stated that the biological mother reported inaccurate and conflicting information before finally admitting to unethical and deceitful conduct. The information provided by the biological mother was in fact accurate and truthful, and given of self-accord. In addition, it was the biological mother who continually showed Defendants Wennstrom and Voliva in the school office the GeoB website, how to log in to it, and how the official web page did not indicate actual GeoB exam questions were included in the "GeoB material" that was purchased. Defendant Wennstrom's statement that the biological mother only admitted to misconduct when confronted by evidence produced by the investigation is also patently false, as the claimed evidence was self-reported by the biological mother to explain what happened.

d. Defendant Wennstrom also stated in her email that the academic dishonesty and cheating which Plaintiff, biolgical mother, R.J., and A.J. engaged in, put all District students and the District at risk of being banned from the current and future GeoB contests. She further stated that the director of the GeoB had indicated that only by eliminating R.J. and A.J. from the current and all future GeoB contests, would the District and District students be able to participate in the current and future GeoB contests. This is in direct contradiction with information from the GeoB director herself, who wrote that any decision on punishment of R.J. and A.J. was completely up to the District, and had no bearing on the continued participation in GeoB contests, current and future. Defendant Wennstrom's statement was further shown to be false, as R.J. and A.J. did not have to be eliminated from the current GeoB contest as they had been withdrawn voluntarily on January 15, 2016 by Plaintiff and biological mother.

e. Defendant Wennstrom placed what she termed, "severe sanctions" on R.J. and A.J. by banning them from any further participation in any Butler School District #53 academic contests and/or competitions, team or individual, while they are students within District #53. This posed a 3.5 year ban for R.J., and a 4.5 year ban for A.J. Plaintiff and biological mother were sanctioned by not being allowed to serve in any capacity as a parent volunteer in any school related contests and/or competitions.

23. In response to the one-sided, inaccruate, contradictory report that disregarded the statements and information provided by the biological mother, Plaintiff emailed the Defendant School Board on February 11, 2016 at 9:54 a.m., inquiring about how to file a grievance against Defendant Wennstrom and her findings EXHIBIT 17. The email went out to Defendants Hanzlik, Kumar, Chun, Paskalides, Advani, Rustenberg, and Patel. In less than 3 minutes after receipt, by time stamp,

Defendant Hanzlik forwarded the email from Plaintiff to Defendant Wennstrom EXHIBIT 18. At 4:56 p.m., February 11, 2016, Defendant Wennstrom sent an email to Defendants Hanzlik and Chun to instruct them how to respond to the Plaintiff's request for a grievance, in spite of it being a grievance to be filed against her EXHIBIT 19. At 9:39 p.m., February 11, 2016, Defendant Wennstrom sent Defendant Roselli an email re: Plaintiff's request for a grievance against her.

24. It was only after this series of email communications on February 11, 2016, that on Friday, February 12, 2016, an email was sent from Defendant Hanzlik to Plaintiff re: the District #53 Uniform Grievance Policy (UGP), along with updated policy work, which was to be adopted in the near future. In this email, Defendant Hanzlik stated that Plaintiff and biological mother have the right to a "prompt and equitable resolution". He indicated that he would serve as the Complaint Manager for the grievance, although he was not listed as one of the possible Complaint Managers on the UGP that was in effect as of February 11, 2016. The other possible choice as Complaint Manager was Defendant Wennstrom, who obviously was a non-viable choice since the grievance concerned her conduct, sanctions, and investigation. In fact, Defendant Hanzlik ignored the active UGP, and used the UGP that had not been adopted as of yet. That new UGP was introduced to the Defendant School Board for consideration of ratification on February 8, 2016, which conveniently was the same day as Defendant Wennstrom's sanctioning. Defendant Hanzlik stated that he would designate a qualifed individual to conduct the investigation on his behalf, and asked for a written statement about specific concerns for the grievance EXHIBIT 20, 21, 22.

25. An email from Plaintiff to Defendant Hanzlik on February 14, 2016 raised the question of whether the "qualified individual" to conduct the investigation would "be someone employed by the school district, or a third party". A question was also raised about the potential involvement of Defendant Wennstrom in her role as Superintendent in the UGP EXHIBIT 23. The response email from Defendant Hanzlik later on February 14, 2016 stated that he would use a "third party not connected to the District or Board of Education". He also reported that the investigation does not flow through the Superintendent for a decision. Defendant Hanzlik stated that the investigation is intended to provide a "fair and impartial review of concerns." He further stated that as the individual accountable for the review, he would complete the review "carefully, fairly, and factually." EXHIBIT 24

26. On February 16, 2016, an email was sent by Plaintiff to Defendant Hanzlik to satisfy the request for a written statement EXHIBIT 25. This email clarified multiple points that were deemed unclear by Defendant Wennstrom in her February 8, 2016 investigation findings/sanctions letter. The email also pointed out multiple inconsistencies and inaccuracies in Defendant Wennstrom's letter. The email also specifically mentioned the unprofessional and inappropriate behavior of Defendant Wennstrom and Defendant Voliva towards the biological mother, as well as the unprofessional and inappropriate behavior of Defendant

Voliva towards R.J. during his interrogation. The email also specifically mentioned the breach of confidentiality re: child privacy in that another parent was able to tell the biological mother that she had been told by Dr. Vandana Badlani that R.J. and A.J. had been sanctioned by the Defendant Butler School District #53, and what those sanctions were. The email of the written statement was sent at 2:24 p.m. from Plaintiff to Defendant Hanzlik. By 2:42 p.m., Defendant Hanzlik communicated the contents of the written statement to Defendant Wennstrom by email. Defendant Wennstrom emailed Defendant Hanzlik back with instructions of how to proceed re: the grievance being filed against her EXHIBIT 26.

27. On February 18, 2016, Plaintiff and biological mother received an email letter from Margaret Fisher, on behalf of Defendant Libby Massey. This email indicated that Defendant Massey was the investigator chosen by Defendant Hanzlik to conduct the grievance EXHIBIT 27. The email indicated that Defendant Massey recommended an attempted resolution meeting first, which would be mediated by Defendant Roselli. If no resolution could be achieved, then Defendant Massey would commence the investigation, and her findings would be given to the Defendant School Board for the decision making process, as they were to remain neutral and unbiased in this situation. On February 22, 2016, Plaintiff sent an email to Defendant Massey stating that Plaintiff and biological mother would be agreeable to participating in a resolution meeting. Between February 22, 2016 and February 29, 2016, a series of emails were exchanged between Plaintiff and Defendant Massey re: setting up the resolution meeting EXHIBIT 28, 29, 30, 31, 32, 33.

28. On Monday, March 7, 2016, a meeting took place between Plaintiff, biological mother, and Defendants Roselli, Wennstrom, and Voliva at the Butler Junior High School. The first thing expressed by Plaintiff and biological mother was a desire to audio record the discussion in order to ensure accuracy of the meeting and for later reference. Plaintiff and biological mother were told by Defendants Roselli, Wennstrom, and Voliva that audio recording was not allowed. The meeting itself was several hours long, and concluded with an offer by Defendants Wennstrom and Voliva, with the backing of Defendant School Board, to reduce the length of ban from competitive educational participation for R.J. and A.J. to 2 years, instead of for the remaining time they were in the School District #53 system. The offer was not accepted by Plaintiff and biological mother, as there was still no evidence of any impropriety carried out by R.J. or A.J. that would warrant a set of severe sanctions. A letter was written by Plaintiff and emailed to Defendant Hanzlik, as the Complaint Manager, re: several deep concerns that arose for Plaintiff and biological mother during the course of the resolution meeting. This letter of concerns was emailed to Defendant Hanzlik, and emailed by carbon copy to Defendant Roselli, on March 9, 2016 EXHIBIT 34. The letter raised four specific concerns:

a. Within the first few minutes of starting the meeting, Defendant Wennstrom identified Defendant Roselli as the School District #53 attorney. This raised concerns for the Plaintiff and biological mother as the resolution mediator is to be neutral and impartial, assisting the process of mediation between the two sides at impasse; how can that neutrality and impartiality be present if the mediator is the actual attorney for the School District, and was identified by Defendant Wennstrom as having a critical role in guiding her investigation and sanctioning of Plaintiff, biological mother, R.J., and A.J.? Plaintiff and biological mother were fully unaware that Defendants Wennstrom and Voliva would be represented by Defendant Roselli, as the School District #53 lawyer; plaintiff and biological mother were never offered or recommended to have legal representation present, despite Defendants Wennstrom and Voliva being represented by Defendant Roselli. The statement by Defendant Wennstrom also fully contradicted the information provided by Defendant Hanzlik, who had stated to Plaintiff that for the grievance complaint, he would be hiring a third party who was not connected to the School District #53 or Defendant School Board. Defendant Wennstrom's statement proved Defendant Hanzlik to have falsely misled Plaintiff and biological mother by not only not actually hiring a neutral third party for the grievance as he had promised, but in fact by using the School District #53 actual legal counsel, Defendant Roselli and her partner, Defendant Massey, and their law firm, Robbins Schwartz.

b. Defendant Wennstrom told Plaintiff and biological mother that the Defendant School Board had been kept up to date throughout her personal internal investigation leading up to the February 8, 2016 sanctions placed by her. She reported that multiple Defendant School Board meetings took place dealing with the grievance case, and at least one of these meetings involved the entire Board being present. Defendant Wennstrom told Plaintiff and biological mother, that prior to the resolution meeting, she was instructed by the Defendant School Board that they did not want to reduce any of the sanctions placed against R.J. and A.J. Defendant Wennstrom stated that because she has an "interest in child development", that she would work with Plaintiff and biological mother to reach a resolution, then step outside to call Defendant Hanzlik to get approval.

c. Defendant Wennstrom stated to Plaintiff and biological mother that she had heard a recorded phone conversation between biological mother and Dr. Vandana Badlani, and that this conversation had helped her "decide" whether to believe Dr. Vandana Badlani's account of events over the biological mother's account. Defendant Wennstrom stated that this led her to pursue the investigation against Plaintiff, biological mother, R.J., and A.J., and to pursue sanctions against them. Neither Plaintiff nor biological mother were aware of said phone conversation being recorded, and certainly no consent was ever given to be recorded. Several details mentioned by Defendant Wennstrom did not make sense, and Plaintiff and biological mother asked to hear the conversation to verify its validity and accuracy. Defendant Wennstrom stated that Plaintiff and biological mother could not hear the conversation because it was recorded by and in possession of Dr. Ravi Badlani. When asked literally on three separate occasions if there was a transcript of the conversation that could be read by Plaintiff and biological mother, Defendant Wennstrom clearly stated no, there was no transcript of the conversation.

d. Defendant Massey's introduction letter to Plaintiff and biological mother re: being hired as the Complaint Investigator by Defendant School Board , referenced that Defendant Hanzlik, as Complaint Manager, would not be in attendance at the resolution meeting of March 7, 2016 so that he could remain impartial should a resolution not be reached, since the Defendant School Board would determine the final verdict of the grievance based on Defendant Massey's investigation. Defendant Wennstrom's statement about the Defendant School Board instructing her prior to the resolution meeting to not reduce sanctions against R.J. and A.J. brought into serious question any possible impartiality that could be shown by Defendants Hanzlik and School Board in deciding the grievance following investigation.

29. On March 8, 2016, the day after the resolution meeting, a Freedom of Information Act (FOIA) request was submitted by Plaintiff and biological mother to School District #53 FOIA officer, Vicki Galvin EXHIBIT 35. On March 9, 2016, an email was sent to Plaintiff indicating that the FOIA request had been received and would be processed EXHIBIT 36. On March 15, 2016, the School District #53 response to the FOIA request was received by the Plaintiff in the form of an email, with two attachments. The email came from Catherine Locallo, an attorney with firm of Robbins Schwartz.

30. On March 10, 2016, Defendant Hanzlik sent an email with attached letter to Plaintiff in response to Plaintiff's letter of concerns from the resolution meeting EXHIBIT 37. Defendant Hanzlik made numerous statements of concern in this letter:

a. Defendant Hanzlik stated that re: the grievance policy, the Complaint Manager is the individual assigned to conduct the grievance investigation. He wrote that he hired an outside party to conduct the investigation for the grievance because School District #53 is a small school district and all administrators were involved somehow in the investigation of Defendant Wennstrom that led to the original sanctions, and because Plaintiff had requested a third party to conduct the investigation. Defendant Hanzlik does not mention that at the time of the filing of grievance, the active and current UGP, #1400, called for the Complaint Manager to be either Mr. John Barr, or Ms. Beth Mouw. Neither Mr. Barr nor Ms. Mouw had anything to do with the original investigation by Defendant Wennstrom, but neither was offered to Plaintiff or biological mother as an option for Complaint Manager. Defendant Hanzlik took it upon himself to name himself as the Complaint Manager, and used the version of the UGP #1400 that was up for review and adoption starting in March 2016, i.e. was not active yet. The other option for Complaint Manager under the unapproved UGP version was Defendant Wennstrom, whom the grievance was pertaining to. Defendant Hanzlik also did not mention that in fact, he did not hire an outside third party to conduct the investigation. He did not hire anyone; he simply used the School District #53's long-standing retained council in the firm of Robbins Schwartz, and Defendants Roselli and Massey. Defendant Hanzlik's statement that "all of his actions and decisions….have been completed consistent with and in compliance with the Board's policies and procedures" is falsely misleading; he did not use the current UGP, but used a proposed UGP that was not to take effect until March 2016. His actions were also completely opposite of what had been discussed with Plaintiff, i.e. that he would be hiring a third party not connected to the School District #53 or Defendant School Board.

b. Defendant Hanzlik stated that the law firm of Robbins Schwartz was retained by the Defendant School Board, and "they are acting on the Board's behalf and at the Board's direction, not on behalf of or at the direction of the Superintendent or any school district administrator." This statement is again falsely misleading, as Defendant Roselli was identified by Defendant Wennstrom at the resolution meeting as legal counsel. Defendant Wennstrom also referred to Defendant Roselli as "our attorney" in email EXHIBIT 38. Review of FOIA material shows Defendant Wennstrom in touch with Defendant Roselli as far back as January 26, 2016 EXHIBIT 39.

c. Defendant Hanzlik states that by having two separate attorneys conduct the resolution meeting and the investigation related to the grievance, this would allow "honest and fruitful discussions to facilitate resolution" and avoid influencing the investigator. Defendant Roselli was present at the resolution meeting as both resolution mediator, and as legal counsel for the School District #53. This dual role represents a serious conflict of interest. Defendant Roselli told Plaintiff and biological mother at one point, when Plaintiff and biolgical mother were contemplating the resolution offer, that she did not believe Plaintiff and biological mother would get a better offer from the School District #53 or Defendant School Board. In addition to this, an email from Defendant Massey on March 24, 2016 was sent to Defendants Hanzlik, Wennstrom, and Roselli EXHIBIT 40. If having two separate attorneys is meant to avoid influencing the Complaint Investigator, as alleged by Defendant Hanzlik, then why is Defendant Roselli in the email chain of legal advice being discussed between Defendants Hanzlik and Massey? In addition to this, from the same email, why is Defendant Wennstrom in the same email chain re: legal advice from Defendant Massey, if as claimed by Defendant Massey, Defendant Wennstrom had no role in the grievance proceedings against her, other than to grant Defendant Massey an interview for the Complaint Investigation? The dual roles of Defendants Massey and Roselli as advising legal counsel for Defendants School District #53, Hanzlik, and Wennstrom and the supposed neutral, fair, equitable third party Resolution Mediator and Complaint Investigator in the UGP, in addition to the multiple false statements made by Defendants Hanzlik and Wennstrom to Plaintiff and biological wife, is further proof of the conspiracy created to violate the rights of Plaintiff, biological wife, R.J., and A.J.

d. Defendant Hanzlik attempted to minimize or trivialize the recorded phone conversation between the biological mother and Dr. Vandana Badlani, which was obtained illegally without consent of biological mother by Dr. Ravi Badlani. This phone conversation could not be verified for accuracy or even legitimacy because Defendant Wennstrom stated that the actual recording was in the possession of Dr. Ravi Badlani, and she stated on three occasions during the resolution meeting that there was no transcript of the phone call to review. However, upon review of FOIA material received 8 days following the resolution meeting, a transcript of the phone recording that "did not exist" per Defendant Wennstrom, showed up, with Defendant Wennstrom's inclusion in the transcript itself EXHIBIT 41. This emailed transcript was sent from Defendant Wennstrom to herself and Defendant Voliva. This was extremely concerning to Plaintiff and biological mother because it proved Defendant Wennstrom to be a liar (how can you say there is no transcript of a phone conversation, when you emailed it to yourself two months prior), and also, Defendant Voliva did not speak up once at the resolution meeting when Defendant Wennstrom was being questioned about a transcript of the illegally obtained phone conversation, and she denied its existence three times. Defendant Voliva was aware that there was a transcript; she was emailed it by Defendant Wennstrom; but Defendant Voliva did not speak up. Defendant Hanzlik's statement that the phone conversation was "but a very small part of the overall picture" is absolutely contradictory to Defendant Wennstrom's statement to Plaintiff and biological mother at the resolution meeting that the phone conversation was the one thing that led Defendant Wennstrom to pursue an investigation and sanctions against Plaintiff, biological mother, R.J., and A.J. rather than Dr. Vandana Badlani.

e. A police report was filed by biological mother on May 2, 2016 re: the illegal phone recording EXHIBIT 42. Defendant Wennstrom's statement to the police was that Dr. Vandana Badlani played the recording of the phone conversation to her. Defendant Wennstrom stated that the portion of the conversation where Dr. Vandana Badlani was speaking was clear, but the portion that was supposed to be biological mother was often distant and actually inaudible at times. Defendant Wennstrom stated that she tried to take notes of what she heard, but could not keep up with the conversation. She admitted that she may have switched who said certain things, and definitely did not get all of what was said on the recording; she started paraphrasing after a short while, and put things into her own words from what she could recall from the conversation. Dr. Vandana Badlani's statement to police, after looking at the transcript of the illegal recording, was that small parts were said by her, but not in her wording, and not in order of the conversation. She stated that the transcript was not an accurate representation of the conversation. Dr. Vandana Badlani told that police that the idea to record the phone conversation came from her husband, Dr. Ravi Badlani, who was approximately 5-6 feet away from his wife as he recorded her with his cell phone. The Badlanis denied that the intent of the recording was to record the biological mother. These statements to the police from Defendant Wennstrom and Dr. Vandana Badlani both appear to be blatant lies. If Defendant Wennstrom was taking the notes of the transcript, why is her name included as speaking on the transcript? Etiher she was not taking the notes, or she was part of the illegally recorded conversation. If Dr. Ravi Badlani was holding the cell phone that was recording his wife 5-6 feet away from her, why is it that when he is quoted in the transcript, it is noted that his voice was in the background? That is not possible if he was holding the recording device.

f. Defendant Hanzlik made several unproven statements about how the investigation has been "very expensive to taxpayers and has had a negative impact on academic deliverables for the last two months." He offered an extension of the resolution offer deadline contingent on withdrawal of the FOIA request by Plaintiff and biological mother that was pending at the time of his letter, as he claimed the FOIA request would cost the School District #53 more than $10,000.00 in administrative time and legal expenses to respond to it, and this would take away from the administration's ability to focus on serving the educational needs of the students of District #53. This statement is contradictory to the very core of FOIA – access to information is a right given to the individual, and making an offer related to resolution contingent on withdrawing a FOIA request is inappropriate. Defendant Hanzlik concluded his letter with a veiled threat of future legal action to recover from Plaintiff and biological mother the purported $100,000.00 the School District #53 had spent to date on the investigation, or other legal action the Defendant School Board determines to be appropriate.

31. On March 12, 2016, an email was sent to Defendant Hanzlik by Plaintiff to inform him that Plaintiff and biological mother had decided to hire attorney, Christopher Stull to represent the interests of R.J. and A.J EXHIBIT 43. It had become apparent at that time to Plaintiff and biological mother that there were increasing discrepancies and concerns rising up re: the validity, neutrality,

fairness, and impartiality of the grievance process at that time. On March 13, 2016, an email from Defendant Hanzlik to Plaintiff confirms notification of hiring of an attorney on behalf of R.J. and A.J., and Defendant Hanzlik states that he will notify the Defendant School Board EXHIBIT 44.

32. Between March 23, 2016 and March 25, 2016, multiple emails were exchanged between biological mother and Defendant Massey to set up a time for an interview between biolgical mother and Defendant Massey, as part of the grievance investigation.

33. On April 15, 2016, Plaintiff and biological mother received an email with a letter from Defendant Hanzlik with the Defendant School Board's decision re: Defendant Massey's investigation for the grievance EXHIBIT 45. The Defendant School Board unanimously affirmed the findings and sanctions of Defendant Wennstrom as well as Defendant Massey. Defendant Hanzlik made several statements concerning the summary of Defendant Massey's findings as follows:

    a. Defendant Massey found that the biological mother had intentionally obtained the 2016 GeoB exam questions to prepare R.J. and A.J. for the GeoB exam. This claim of intent by Defendant Massey was made despite the biological mother self-reporting the purchase of possible exam material to Defendants Wennstrom and Voliva, self-reporting the email address used for the material, the purchase was made by her brother with her credit card, she was offering to share the material with her friends in a study group forum, and she willingly withdrew her children from the GeoB competition without even knowing if the material purchased was truly the 2016 exam or not.

    b. Defendant Massey stated that on January 15, 2016, the biological mother knew that the GeoB material she had obtained was the actual exam questions. This is falsely misleading as it was only Dr. Vandana Badlani who seemed sure that the material was the actual exam; the biological mother had no way of knowing if the material was the actual test or not, but still withdrew her children from the GeoB exam and self-reported the purchase of material to Defendants Wennstrom and Voliva.

    c. Defendant Massey stated that during a phone conversation on January 15, 2016, the biological mother told Dr. Vandana Badlani that she had "jailbroke" the GeoB website and had obtained the 2016 GeoB exam questions. This statement by Defendant Massey makes absolutely no sense. The term "jailbreak" does not apply to any website on the internet; it is a term for decoding an Apple device such as an iPhone, to allow the user to install third party applications. In addition to no one possibly knowing what it means to "jaibreak" a website, since the term does not make sense, the purchase of the GeoB material was made by Mr. Patel via the biological mother's credit card as referenced previously. In addition to this, the phone conversation referenced by Defendant Massey was not on January 15, 2016, but was in fact apparently the illegally recorded phone conversation of January 16, 2016 by Dr. Ravi Badlani. The purported transcript of the phone conversation, which per Defendant Wennstrom did not exist but has her quoted within it, mentions the biological mother as stating that she "jailbroke" the website. As Defendant Wennstrom has reported that the illegally obtained phone conversation's transcript is inaccurate, and the illegally recorded conversation has been reportedly destroyed by Dr. Ravi Badlani, there is no way to confirm that anyone, whether the biological mother or Dr. Vandana Badlani, used the term "jailbreak". It makes no sense within the context of the credit card purchase. In addition, Defendant Massey accepted the illegality and improper nature of the recorded phone conversation plus the inaccurate (per Defendant Wennstrom) transcription of this transcript, and had told the biological mother that this would not be used as part of her investigation EXHIBIT 46.

d. Defendant Massey stated that during the January 15, 2016 conversation between the biological mother and Dr. Vandana Badlani, the biological mother read at least three of the GeoB questions to Dr. Vandana Badlani in order to prove to her that she had the contest questions. This is contradictory to prior findings by even Defendant Wennstrom. It was Dr. Vandana Badlani who asked the biological mother to recite the questions after the biological mother offered to share study material that had been purchased on the GeoB website. Dr. Vandana Badlani did not tell the biological mother that the questions sounded like actual GeoB questions, as claimed by Defendant Massey; Dr. Vandana Badlani stated directly to the biological mother that the biological mother in fact had the actual 2016 contest questions.

e. Defendant Massey's statement that Dr. Vandana Badlani told the biological mother to pull her children out of the GeoB contest is false; it was the other way around, and the biological mother told Dr. Vandana Badlani that she had already withdrawn her children from the GeoB exam.

f. Defendant Massey's statement that Dr. Vandana Badlani first reported to Defendant Wennstrom on January 16, 2016 is false; Defendant Wennstrom herself stated that she was first approached on January 15, 2016. Also, Defendant Wennstrom was included in the illegally obtained phone conversation transcript from the early morning hours of January 16, 2016.

g. Defendant Massey's statement that the biological mother tried more than once to implicate Dr. Vandana Badlani is misleading. The biological mother stated that she had offered to share the material with Dr. Vandana Badlani's sons in a study group, and Dr. Vandana Badlani seemed to be the only one who knew that the questions from the purchased material were the actual exam questions.

h. Defendant Massey's statement that the biological mother allowed Defendant Voliva to print the emails and attachments from the GeoB registered account is false. Defendant Voliva accessed the email account without permission. At no time was the biological mother asked by Defendant Voliva if she could access the email account.

i. Defendant Massey's statement that the Plaintiff opened the GeoB registration and created the GeoB email address is 100% false. This was proven by providing evidence of Plaintiff being at work in Merrillville, Indiana at the time that the account was registered EXHIBIT 47.

j. Defendant Massey's statement that the biological mother, when asked by Defendant Wennstrom about why she used her own credit card, stated she would never make "*that*" mistake again, is falsely misleading. By placing the word "that" in italics, Defendant Massey is trying to imply guilt, when in fact the biological mother self-reported the purchase of material by her brother on her credit card.

k. Defendant Massey's statement that on February 2, 2016, R.J. was "not interrogated" by Defendant Voliva and assistant principal Owen, and that R.J. was treated with respect and kindness. This is completely contrary to the report of an 11 year old boy, who felt that Defendant Voliva was being overbearing, rude, and aggressive towards him, including the feeling that she was accusing him of cheating on the WordMasters competition. With no parents in the room, being aggressively questioned by the school principal with questions prepared by Defendant Wennstrom, R.J. absolutely felt terrorized and interrogated in the room. Of note, R.J. mentioned that he believed to have seen assistant principal Owen with a recording device, perhaps an iPhone recording on the Voice Memo app, and she was trying to hide it underneath the table. No audio recording of the purported "respectful" interview was ever provided to the Plaintiff or biological mother.

l. Defendant Massey's statement that at the grievance appeal, the biological mother "fabricated" a new story about how Mr. Patel had created the GeoB account and purchased exam material, is 100% false and directly contradicted by Defendant Massey's own investigation report, which several paragraphs earlier, states that the biological mother reported to Defendant Wennstrom and Voliva at their first meeting about her brother and the purchase. The statement that Trushar Patel's involvement is untrue, unfounded, and unsupproted by the record is false as well; the mailing adress was confirmed, the name was confirmed, residency at the

e. Tell R.J. that the other student that had seen him get hit, did not think it was hard enough to hurt a baby

f. Tell R.J. that may he should be separated from the other children if such a light hit hurt him

g. Tell R.J. that she thinks he is a cheater and a liar

36. R.J. told my wife that he was confused why Defendant Voliva was mad at him and yelling at him, when all he did was report that he had been hit. He told the biological mother that he would never tell her again if a teacher hit him at school. The biological mother took R.J. to the police station and filed a report, then returned to the school to pick up R.J.'s bag and coat. She ran into assistant principal Lisa Owen, who asked R.J. to write a statement over what happened. After writing his statement and getting ready to leave, Defendants Voliva and Wennstrom showed up. Defendant Voliva told the biological mother that there were contradictory reports from R.J. about what happened, whether he was slapped/punched/struck, etc., and that she did not believe him. Defendant Wennstrom asked the biological mother if R.J. was on medication, because he had said that it hurt when his head was struck. Defendant Wennstrom then proceeded to ask R.J. to simulate how hard he was hit, and started to take cell phone video of him hitting the table. After reading his statement, Defendant Wennstrom told R.J. that Ms. Quinn could lose her job over this incident. R.J. began to cry again, stating he didn't want to hurt anyone, and he didn't want anyone to be fired. Defendant Wennstrom suggested to R.J. that he may want to write his statement again. The biological mother spoke to Defendant Wennstrom and pointed out to her that statements such as that would only pressure R.J. to write down a false statement to prevent hurting anyone. After he calmed down a little, R.J. re-wrote his statement that he was hit in the head by the substitute teacher.

37. The actions of the Defendants as listed above have created a hostile environment in both the School community, as well as the Oak Brook Community at large. This environment has led to fostering of retaliation towards Plaintiff, biological mother, R.J., and A.J. A.J. was notified by letter that he had been accepted into the gifted English program at school in mid June 2016. On June 22, 2016, an email from Defendant Voliva stated that a mistake had been made, and A.J. had been incorrectly mailed an acceptance to the program, when he actually did not qualify for it. No explanation was given for the "error" EXHIBIT 50. The Oak Brook community is a very small one, tight knit, and the School District #53 school systems are small. Despite not using the names of R.J. and A.J., the actions of the Defendants were calculated such that virtually everyone in the Brook Forest Elementary School, as well as in the community at large, knew that the family involved in academic dishonesty was that of the Plaintiff, biological mother, R.J., and A.J. The plaintiff, biological mother, R.J., and A.J. have stayed silent

throughout the process since it began January 15, 2016. No public statements have been made to the media or at the school level.

38. In contrast to that, the Defendants have been vocal in continuously updating the entire District #53 community, as well as Oak Brook, about what is going on re: the academic dishonesty claim. As mentioned before, Defendants Wennstrom and Voliva made sure to speak about the purported academic dishonesty claim with not only relevant parties, but also across the board to parents, teachers, and staff who had no bearing or involvement in this process. The repeated public communications of Defendants Wennstrom, Hanzlik, and School Board, have continued to foster an unhealthy environment for Plaintiff, biological wife, R.J., and A.J. Both R.J. and A.J. have had feelings of isolation and rejection over loss of many of their friends. Current and future teachers and staff that interact with R.J. and A.J. have been notified in advance by Defendants Wennstrom and/or Voliva to be on the look out for the slightest mistakes or actions that could allow for investigation of R.J. and A.J. This hypervigilant atmosphere has not been conducive to learning or enjoyment of the school arena, which children are guaranteed as a right. R.J. and A.J. have effectively lost virtually all their friends, as children's parents in the school system do not want their children to associate with them. In the community, Plaintiff, biological mother, R.J., and A.J. have been ostracized. Plaintiff and biological mother have also endured ridicule and social avoidance pertaining to other families in the community. They have also received "hate mail" at home, had to endure news crew/camera coverage around their house at times. Specific examples include:

a. Front page Chicago Tribune article 6/17/16 identifying Plaintiff as filing suit against District #53 EXHIBIT 51.

b. Article in "Daily Herald" EXHIBIT 52 from 6/6/16 which had several blatant slanderous falsehood statements from Defendant Hanzlik, that Defendants Roselli and Massey are not associated with each other (proven false above), and that the Defendant School Board has "conclusive proof there was intent to cheat by the parents and that children were prepped with that material." This in direct contast to the actual findings by all school investigators and administrators that R.J. and A.J. never saw the GeoB material and were not prepped for the test.

c. Plaintiff has suffered damage to his reputation as a respected physician in the community, ranging from being questioned by fellow physicians and patients, people stating that they would not go visit a physician who teaches his kids to cheat, to people questioning if he cheated to obtain his medical license and board certification.

d. Plaintiff and biological mother receiving U.S. postal mail from anonymous people, calling them cheaters or accusing them of teaching their children to cheat EXHIBIT 53.

e. Multiple emails to the District #53 families by Defendants to keep the negative feelings towards Plaintiff, biological mother, R.J., and A.J. fresh.

f. Plaintiff had to switch jobs to be closer to home due to the social difficulties R.J. and A.J. have been going through.

g. Email of 6/15/16 from Defendants Wennstrom and School Board to the District #53 families, giving updates on the legal process, and containing false statements that due diligence and due process consistent with state and federal law was given to Plaintiff, biological mother, R.J.,, and A.J. EXHIBIT 54

h. Continued use of Defendant School Board meetings to foster negative feelings toward Plaintiff, biological mother, R.J., and A.J. This includes the reading of three "anonymous" letters at a March 14, 2016 meeting by Defendant Wennstrom who stated that all three letters showed up that very day. Also, on 7/11/16, Defendant Wennstrom stated at the meeting that due process had been given to Plaintiff, biological mother, R.J, and A.J. There was also a meeting on 8/8/16 during which students were asked to speak about their thoughts re: academic dishonesty. The Badlani boys both spoke, and discussed that there are "good" families and "bad" families, and that the "bad" families should be punished.

i. R.J. was confronted by a student at lunch on November 1, 2016. He was approached by another student who told R.J. that his parents had said he cheated on the GeoB exam, and that he was a cheater. This student then proceeded to tease R.J. during lunch and sing songs about how R.J. was a cheater EXHIBIT 55πøπ.

IV.

CLAIM FOR RELIEF AGAINST DEFENDANTS SCHOOL DISTRICT #53, SCHOOL BOARD, WENNSTROM, HANZLIK, VOLIVA, MASSEY, ROSELLI, AND ATTORNEY DOE

39. Repeat and reallege the allegations set forth in Paragraph1-38 above.

40. The Defendants in this Complaint are public officials, and as such, are obligated in all official acts to comply with all applicable requirements of federal and state law, including the protection and rights afforded persons under the United States Constitution and its Amendments.

41. Defendants, through their combined actions as described above, fostered an environment in which violations occurred as per the 5th and 14th Amendments, re: Plaintiffs' Federal and State Due Process rights

a. The violation of Due Process was seen in both the investigation and sanctions created by Defendant Wennstrom, with assistance from Defendant Roselli, as noted from February 8, 2016, as well as the UGP resolution meeting and complaint investigation set up by Defendants Hanzlik, Roselli, and Massey. These violations led to an inherently unfair process, with loss of a just judicial process. Both procedural due process and substantive due process were violated. Defendant Wennstrom's findings and sanctions of February 8, 2016 did not allow for a proper opportunity to explain or defend the events from Plaintiffs' side. Defendant Wennstrom leveled her charges and purported investigation findings to the Plaintiffs at the same time as handing down severe sanctions, with the knowledge that there was no evidence that R.J. or A.J. had engaged in improper behavior, and had been cleared of wrong-doing. Defendant Hanzlik's statements of hiring a third party neutral investigator, were found to be patently false by the discovery of Defendant Massey serving a dual role of legal counsel for the School District #53 and Complaint investigator.

42. Defendants, through their combined actions as described above, fostered an environment in which violations occurred of Plaintiffs' protection against cruel and unusual punishment as per the 8th Amendment

a. The sanctions and subsequent treatment of R.J. and A.J by their peers with loss of friendship, insults, and loss of overall social interaction with their peer group, stemmed from a punishment that was arbitrarily handed down by Defendant Wennstrom. This created a situation where the punishment was degrading to their dignity. The notion of punishment of children for any purported misdeeds of their parents, so-called bill of attainder, has been outlawed in modern day society for hundreds of years. As they were pulled out of the GeoB exam and never saw the materials, the punishment of R.J. and A.J. was patently unnecessary.

43. Defendants, through their combined actions as described above, fostered an environment in which violations occurred of Plaintiffs' rights to an impartial jury and allow for counsel for their defense, in violation of the 6th Amendment.

44. Defendants, through their combined actions as described above, fostered an environment in which violations occurred of Plaintiffs' rights against self-incrimination as per the 5th Amendment.

a. The interrogation tactics in questioning a solitary elementary school child surrounded with multiple adult figures, who are leading that child to give specific answers creates a pressure-filled environment where young children are unfairly treated.

45. Defendants, through their combined actions as described above, fostered an environment in which retaliatory actions were taken against the Plaintiffs' for exercising their due process rights, or Plaintiffs' were open to retaliatory actions from the surrounding school and local community.

46. Defendants, through their combined actions as described above, fostered an environment in which emotional child abuse was inflicted on minor children who were being interrogated by authority figures in the Principal's office, with no representation. This also represented violation of the inherent right of a child to a safe, non-hostile school experience with a right to education.

47. Defendants, through their combined actions as described above, fostered an environment in which the educators and attorneys worked together to keep Plaintiffs from exercising their due process rights.

48. Plaintiffs ask for damages to be awarded against each Defendant for an aggregate total of $50 million for violations of the 5th, 6th, 8th, and 14th Amendment rights of the Plaintiffs, and punitive or exemplary damages awarded against Defendants Wennstrom, Voliva, and Hanzlik in an amount the Court or trier of fact deems appropriate to penalize and prevent them from engaging in such conduct blatantly in violation of Constitutional limitations on the exercise of their governmental powers and official duties, and granting preliminary and permanent injunctive relief granted mandating the correction of school records and enjoining and striking the punishment imposed on R.J. and A.J., barring them from participating in academic contests and extracurricular academic activities.

EXHIBIT 1

Heidi Wennstrom <hwennstrom@butler53.com>

Geography Bee

7 messages

Jennifer Traub <jtraub@butler53.com> Sat, Jan 16, 2016 at 11:46 AM
To: Heidi Wennstrom <hwennstrom@butler53.com>

My information for the geography bee is [redacted] and then the password is [redacted] I'm attaching this year's contest information, too.

The sign up options are no longer available (it's after the deadline) but I've also attached a screen shot, saying it's available for home schooled students too.

Let me know if there's anything else I can do to help!

Jen

--

Mrs. Jen Traub
Advanced Learning Facilitator
Brook Forest Elementary School
jtraub@butler53.com
630.920.7641

"The important thing is not to stop questioning. Curiosity has its own reason for existing." -Albert Einstein

---

2 attachments

SIGN IN OR REGISTER!

Screen Shot 2016-01-16 at 11.41.40 AM.png
536K

geobee-2015-2016.pdf
19915K

Jennifer Traub <jtraub@butler53.com> Wed, Jan 20, 2016 at 10:09 AM
To: Heidi Wennstrom <hwennstrom@butler53.com>

Good morning!
This is the email I sent out regarding study strategies. It went to all students that registered.
Thanks!
Jen
---------- Forwarded message ----------
From: **Jennifer Traub** <jtraub@butler53.com>
Date: Wed, Jan 6, 2016 at 7:41 AM
Subject: Geography Bee
To: John Chulos <jchulos@butler53.com>, Joseph Philip Gianatasio <jpgianatasio@butler53.com>, Campbell Jones <cjones@butler53.com>, Sana Kamal <skamal@butler53.com>, Hamza Rauf <hrauf@butler53.com>,

Sinan Abusalah <sabusalah@butler53.com>, Smaya Anand <sanand@butler53.com>, Sofia Arain <sarain@butler53.com>, Hali Dib <hdib@butler53.com>, Elena Koulouris <ekoulouris@butler53.com>, Taha Mohammad <tmohammad@butler53.com>, Ava Pena <apena@butler53.com>, Arjun Shah <arshah@butler53.com>, Amal Arora <aarora@butler53.com>, Angela Howe <ahowe@butler53.com>, Ibraheem Kidwai <ikidwai@butler53.com>, Aarav Julka <ajulka@butler53.com>, Cristiana Sandoval <csandoval@butler53.com>, Renee Qin <rqin@butler53.com>, Catherine Huber <chuber@butler53.com>, Badr AbuSalah <babusalah@butler53.com>, Hala Atassi <hatassi@butler53.com>, Akshay Badlani <akbadlani@butler53.com>, Natalie Chang <nchang@butler53.com>, Lily Gerami <lgerami@butler53.com>, Shiv Goel <sgoel@butler53.com>, Aadam Hitchens <ahitchens@butler53.com>, Rohan Julka <rjulka@butler53.com>, Isha Rao <irao@butler53.com>, Saanvi Sethi <ssethi@butler53.com>, Prachi Shah <pshah@butler53.com>, James Spagoletti <jspagoletti@butler53.com>, Priya Dhananjaya <pdhananjaya@butler53.com>, Arez Junejo <arjunejo@butler53.com>, Siddarth Malapati <smalapati@butler53.com>, Arjun Saini <asaini@butler53.com>, Jaden Schmit <jschmit@butler53.com>, Fatimah Shaikh <fshaikh@butler53.com>

Good morning, Geo Bee whizzes!

The contest begins soon! Our first meeting is **Tuesday, January 19th, at 8:00**. We will continue every day until we've finished all of the rounds. Please be prompt! We will go over rules first, and then jump right in that Tuesday.

For study tips and strategies, please visit http://www.nationalgeographic.com/geobee/study-corner/. The website has sample quizzes, and other strategies to practice your geography.

Stop by or email if you have any questions!

Mrs. Traub

--
Mrs. Jen Traub
Advanced Learning Facilitator
Brook Forest Elementary School
jtraub@butler53.com
630.920.7641

"The important thing is not to stop questioning. Curiosity has its own reason for existing." -Albert Einstein

--
Mrs. Jen Traub
Advanced Learning Facilitator
Brook Forest Elementary School
jtraub@butler53.com
630.920.7641

"The important thing is not to stop questioning. Curiosity has its own reason for existing." -Albert Einstein

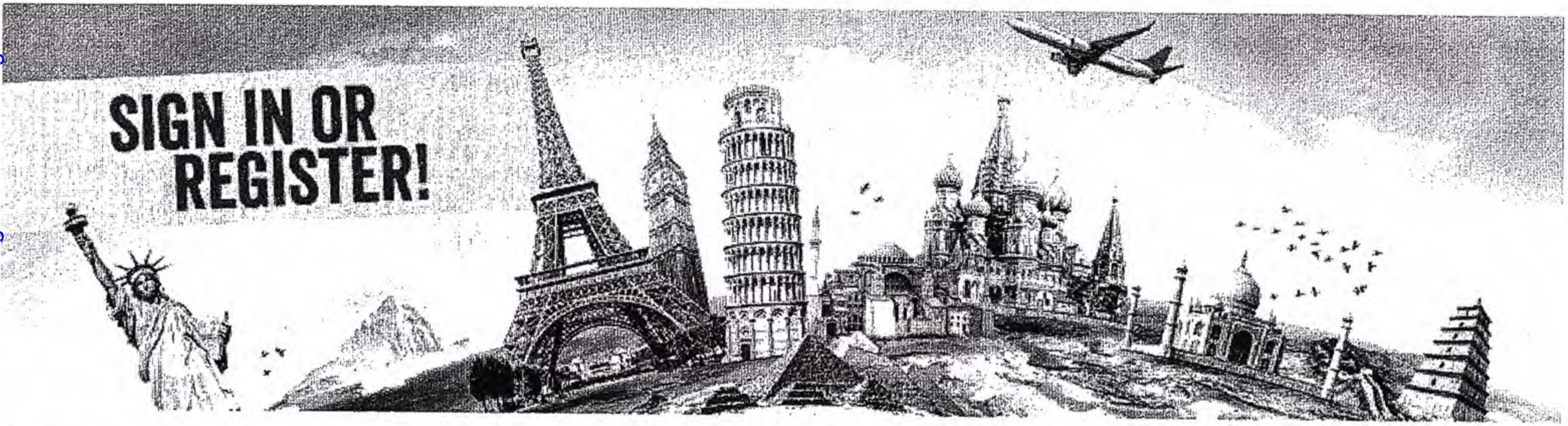
---

Heidi Wennstrom <hwennstrom@butler53.com> Wed, Jan 20, 2016 at 12:25 PM
To: Jennifer Traub <jtraub@butler53.com>

Thank you!
[Quoted text hidden]
--

Heidi Wennstrom, Ph.D, Ed.D

EXHIBIT 2



The National Geographic Bee is a competition for public, private and homeschools in the United States and territories. Schools with students in grades 4-8 are eligible for this educational and entertaining contest.

On this website you can complete the following:

- Create a Bee Account for your School Bee Coordinator.
- Locate and register your school by zip code (in the box below).
- Submit your payment by credit card, or download your invoice to pay by check.
- Download your Bee materials (once you've paid).
- Input your school champion information and proctor the student taking the online Qualifying Test.

EXHIBIT 3

CREDIT CARD RECEIPT

DATE: 1/15/2016

Account# NGBEE 20916

2016 National Geographic Bee Registration

BILLED TO:

Rosselle Homeschoolers
325 william street
rosselle, IL 60172
Coordinator: T Patel

Account #	**NGBEE 20916**
Amount Due:	**$120.00**
Amount Paid: 1/15/2016	**$120.00**
Paid by:	**komal julka**
Balance Due:	**$0.00**

Due to security measures, our site does not store the credit card information, and we therefore cannot list which type of card was used, or the last four digits of the card. You may want to use your credit card statement for additional verification.

If you have any questions concerning this receipt, please email ngbee@ngs.org

EXHIBIT 4

Gmail

COMPOSE

Inbox (2)

Starred

Sent Mail

Drafts

More

Bunny

GeoBee Registration (T. Patel) - Registration Pending Inbox x

ngbee@ngs.org

to me

Thank you for submitting your school information. Our staff will review your inf
school registration.

Sincerely,

The Nat Geo Bee Team

Click here to Reply or Forward

0 GB (0%) of 15 GB used
Manage

Terms - Pri

No recent chats
Start a new one

Gmail by Google

Bunny Patel <geowizz57@gmail.com>

GeoBee Registration (Rosselle Homeschoolers) - Pending Registration Approved

1 message

ngbee@ngs.org <ngbee@ngs.org> Wed, Jan 13, 2016 at 5:25 PM
Reply-To: ngbee@ngs.org
To: "T. Patel" <geowizz57@gmail.com>

Your unlisted/homeschool registration has now been approved. Please log back into your Bee account at https://geobee-registration.nationalgeographic.com/ and arrange to pay the $100 registration fee. Once we have received payment, you will be able to download a PDF of your Bee testing materials once they are available.

Sincerely,

The Nat Geo Bee Team

Gmail by Google

Bunny Patel <geowizz57@gmail.com>

GeoBee Registration (Rosselle Homeschoolers) - Payment Confirmation

1 message

ngbee@ngs.org <ngbee@ngs.org> Fri, Jan 15, 2016 at 10:35 AM
Reply-To: ngbee@ngs.org
To: "T. Patel" <geowizz57@gmail.com>

Thank you for your Geography Bee registration payment. Your payment has now been processed, and we have attached your receipt. You can login to the registration site at https://geobee-registration.nationalgeographic.com/ with your email address and password to retrieve your Bee materials.

Sincerely,

The Nat Geo Bee Team

geobee-receipt.pdf
30K

EXHIBIT 5

Gmail

Rahul Julka <rjulkamd@gmail.com>

Geo Bee

1 message

Rahul Julka <rjulkamd@gmail.com> Fri, Jan 15, 2016 at 9:40 PM
To: Jennifer Traub <jtraub@butler53.com>
Bcc: komal julka <kjulka57@gmail.com>

Hi Ms. Traub,

first of all, congratulations on the birth of your son. All the best wishes from our family to yours.

Secondly, my understanding is that you are the Geo Bee co-ordinator for this year's 2016 contest. Unfortunately, after discussion with Komal, we have decided to pull both Rohan and Aarav out of this year's competition.

We will definitely have them consider re-enrolling for next year's contest when that time arrives.

Thank you very much! Sorry for any inconvenience.

Sincerely, Rahul N. Julka (father)

Rahul N. Julka, M.D.
Gastroenterology and Transplant Hepatology
Dalal Medical Corporation
5825 Broadway Suite B
Merrillville, IN 46410
219-981-9000

EXHIBIT 6

Heidi Wennstrom <hwennstrom@butler53.com>

Please follow up with two students

2 messages

Heidi Wennstrom <hwennstrom@butler53.com> Mon, Feb 1, 2016 at 10:13 PM
To: Kelly Voliva <kvoliva@butler53.com>, Lisa Owen <lowen@butler53.com>

Dear Lisa and Kelly,

Will you please meet with the Julka boys tomorrow to close out the investigation? [redacted] Questions should be on target with the other students who were interviewed:

- Congratulations on your success in BF contests.
- I know you were unable to participate in GEO Bee this year? What was the reason?
- Did you study at all for this year's Geo Bee? Please tell us how you prepared for Geo Bee? (ask additional questions if needed)
- Can you tell me any specific questions you studied at home to prepare?
- You were very successful in WordMasters Challenge this fall. You got a very high score. How did you study for that test?
- Did you see or hear any of the exact questions that were on the test?
- Thank you for taking time to talk with us.

[redacted] Thank you.

--

Heidi Wennstrom, Ph.D, Ed.D
Superintendent

Butler School District 53
2801 York Road
Oak Brook, Illinois 60523

(630) 573-2887
(630) 573-5374 (fax)

Lisa Owen <lowen@butler53.com> Mon, Feb 1, 2016 at 10:16 PM
To: Heidi Wennstrom <hwennstrom@butler53.com>, Kelly Voliva <kvoliva@butler53.com>

Kelly,

I'm happy to do this whenever. Please know - I have an Exploremore Committee meeting tomorrow from 10:50 - 11:30 or so.

Just let me know!
[Quoted text hidden]

EXHIBIT 7

2 attachments

SIGN IN OR REGISTER!

Screen Shot 2016-01-16 at 11.41.40 AM.png
536K

geobee-2015-2016.pdf
19915K

Kelly Voliva <kvoliva@butler53.com> Tue, Feb 2, 2016 at 10:10 AM
To: Heidi Wennstrom <hwennstrom@butler53.com>
Cc: Lisa Owen <lowen@butler53.com>

We interviewed Rohan just now following the questions you provided.

Lisa will be writing up the responses and sharing with us very soon.

[redacted] He did state his mom and [redacted] mom had access to the GeoBee test. He also said once his mom realized they were the actual test questions, she and his dad felt it was best they didn't participate [redacted] He said he never actually saw the Geobee Test questions but he knew his mom had them.

[redacted]

Lisa will write up the exact responses.

Kelly
[Quoted text hidden]
--
Mrs. Kelly Voliva
Principal, Brook Forest Elementary
Director of Special Education, Butler School District 53

60 Regent Drive
Oak Brook, IL
630-325-6888 x7610

EXHIBIT 8

Kelly Voliva <kvoliva@butler53.com>

Meeting Tomorrow - IMPORTANT

8 messages

Kelly Voliva <kvoliva@butler53.com> Mon, Jan 18, 2016 at 7:29 PM
To: Lisa Owen <lowen@butler53.com>, Aubrey Ignace <aignace@butler53.com>, Jennifer Traub <jtraub@butler53.com>
Cc: Brittany Kuethe <bkuethe@butler53.com>, Ellen Wozny <ewozny@butler53.com>, Heidi Wennstrom <hwennstrom@butler53.com>

Hello Fifth Grade Team,

Heidi and I would like to meet with you all tomorrow to fill you in on some things that were brought to our attention over the weekend. [redacted]

Ellen, I know you are gone in the morning.

Brittany, I know you are subbing at BJL all day.

Would a meeting sometime before lunch work? I think there are fifth grade specials during that time.

Please let us know.

Kelly

--
Mrs. Kelly Voliva
Principal, Brook Forest Elementary
Director of Special Education, Butler School District 53

60 Regent Drive
Oak Brook, IL
630-325-6888 x7610

Lisa Owen <lowen@butler53.com> Mon, Jan 18, 2016 at 7:30 PM
To: Kelly Voliva <kvoliva@butler53.com>

I have PE from 10:50 - 11:20 and Guidance from 11:20 - 11:50 tomorrow.
[Quoted text hidden]

Kelly Voliva <kvoliva@butler53.com> Mon, Jan 18, 2016 at 7:31 PM
To: Lisa Owen <lowen@butler53.com>

I was thinking 11 would work, too.

Thanks!
[Quoted text hidden]

Ellen Wozny <ewozny@butler53.com> Mon, Jan 18, 2016 at 8:02 PM
To: Kelly Voliva <kvoliva@butler53.com>
Cc: Lisa Owen <lowen@butler53.com>, Aubrey Ignace <aignace@butler53.com>, Jennifer Traub <jtraub@butler53.com>, Brittany Kuethe <bkuethe@butler53.com>, Heidi Wennstrom <hwennstrom@butler53.com>

I should be back by 12 - They can fill me in

EXHIBIT 9

Heidi Wennstrom <hwennstrom@butler53.com>

Word Masters Challenge--Potential cheating

7 messages

Heidi Wennstrom <hwennstrom@butler53.com> Tue, Jan 19, 2016 at 10:07 AM
To: lisa.kennedy@wordmasterschallenge.com
Cc: Kelly Voliva <kvoliva@butler53.com>

Dear Lisa,

Thank you for taking time to speak with Kelly Voliva and me today regarding the potential cheating investigation. The names of the parents and teacher are listed below, although they may have signed up under another name or email.

Mrs. Komal Julka
Dr. Rahul Julka
717 St. Joseph Drive
Oak Brook, IL 60523
home: 630-828-2111
cell: 630-806-6112; 630-306-6460
husband: Dr. Rahul Julka

[redacted]

Former Teacher: Barbara Rebecca

My cell phone is [redacted] Please be in touch following your investigation. Thank you.
Hopefully, no inappropriate behaviors have occurred. Thank you for helping us with the investigation to determine if our winners won honestly.

Heidi Wennstrom

--

Heidi Wennstrom, Ph.D, Ed.D
Superintendent

Butler School District 53
2801 York Road
Oak Brook, Illinois 60523

(630) 573-2887
(630) 573-5374 (fax)

Kelly Voliva <kvoliva@butler53.com> Tue, Jan 19, 2016 at 10:26 AM

EXHIBIT 10

To: Heidi Wennstrom <hwennstrom@butler53.com>
Cc: lisa.kennedy@wordmasterschallenge.com

Hello!

We also need to ask you to see if there is a person under the name of CHRIS LEAUREU that may have registered. She is also a former employee.

Thank you,
Kelly
[Quoted text hidden]

--

Mrs. Kelly Voliva
Principal, Brook Forest Elementary
Director of Special Education, Butler School District 53

60 Regent Drive
Oak Brook, IL
630-325-6888 x7610

Kelly Voliva <kvoliva@butler53.com> Tue, Jan 19, 2016 at 11:06 AM
To: Heidi Wennstrom <hwennstrom@butler53.com>
Cc: lisa.kennedy@wordmasterschallenge.com

We also need you to look up [redacted] and / or [redacted] They live at [redacted]

Kelly

[Quoted text hidden]

Lisa Kennedy <lisa.kennedy@wordmasterschallenge.com> Tue, Jan 19, 2016 at 3:31 PM
To: Heidi Wennstrom <hwennstrom@butler53.com>
Cc: Lisa Kennedy <lisa.kennedy@wordmasterschallenge.com>, Kelly Voliva <kvoliva@butler53.com>

So far, I have only been able to confirm that [redacted] enrolled a 5B team on 10/19/15 and entered "homeschool" as the School/Organization name. I deleted the order so that she can no longer access program materials, but I have not communicated with her yet.

Barbara Rebecca still had access to the Brook Forest account (through email brebecca@butler53.com which may or may not be active). I deleted this account so she will no longer have access to any WordMasters materials.

I have not found any teams listed under [redacted] Leaureu, Rebecca or Julka. I still want to search my credit card records, and will let you know if I find anything.

Lisa
[Quoted text hidden]

--

Lisa Kennedy
Executive Director
WordMasters, LLC
5026 Washington Blvd.
Indianapolis, IN 46205
(888) 385-5656
(888) 385-6833 fax
lisa.kennedy@wordmasterschallenge.com

Kelly Voliva <kvoliva@butler53.com> Tue, Jan 19, 2016 at 3:42 PM

EXHIBIT 11

Butler 53
School District

2801 York Road
Oak Brook, Illinois 60523-2399

Board of Education and
Administrative Center
2801 York Road
Telephone: 630-573-2887
FAX: 630-573-5374

Butler Junior High School
2801 York Road
Telephone: 630-573-2760
FAX: 630-573-5374

Brook Forest School
60 Regent Drive
Telephone: 630-325-6888
FAX: 630-325-8452

www.Butler53.com

February 8, 2016

Dear Mrs. Julka and Dr. Julka,

I write in follow-up to my investigation into academic dishonesty in Brook Forest academic contests and to advise you of my findings and sanctions related to such. As you are aware, on the evening of Friday, January 15, 2016, the District received a report indicating that you may be engaging in unethical and deceptive practices in order to provide your children with an unfair advantage in District academic contests, specifically the National Geographic Bee. The reporter alleged that you obtained the 2015-2016 official contest questions for the National Geographic Bee in advance of the contest scheduled to begin on January 19, 2016. In response to such allegations, the District promptly initiated a thorough investigation into such unethical and deceptive practices. The District's investigation included an interview with you, interviews with relevant other individuals, a review of relevant documents and correspondences and discussions with the National Geographic Bee. The District has concluded its investigation and is issuing findings on the evidence we have gathered. The District was able to confirm through National Geographic Bee, as well as through investigatory interviews and your own admissions, the following:

1. On January 13, 2016 you falsified registration with National Geographic Bee as a homeschool provider in order to access the contest questions in advance of the January 19, 2016 National Geographic Bee so your children would have an unfair advantage during the contest.
    a. You created an email and password in order to register with National Geographic Bee as a homeschool provider and receive the relevant materials.
    b. You created a false name for your school, namely T. Patel Homeschoolers.
    c. You registered as a homeschool provider and created a false name and address, which you indicated was your brother's name and address.
2. On January 15, 2016 you downloaded the 2015-2016 official contest questions from the National Geographic Bee website, which you only had access to because you falsified your identity and indicated you were a homeschool. You admitted that you obtained the contest questions under false pretenses.
3. You provided another District parent with the log-in information to access the official National Geographic Bee contest questions prior to the January 19, 2016 contest.
4. On January 15, 2016 your two friends tried to convince you to withdraw your sons from the National Geographic Bee and report the misconduct to the Principal. On Saturday, January 15, 2016, you sent an email to the teacher withdrawing your children from the January 19, 2016 National Geographic Bee contest, but cited a family wedding as the reason. At that same time, one of your friends who is also a District parent texted you that she would be reporting the incident to the Principal.

5. On the morning of January 19, 2016, you contacted Principal Voliva to report poor parent behavior (accusing another parent of engaging in the misconduct in which you engaged) and an aggressive, competitive school environment.
6. During our interview with you on January 19, 2016, you continued to report inaccurate and conflicting information for two hours before finally admitting to the unethical and deceitful conduct in which you engaged. Furthermore, you only admitted to such conduct when confronted with the evidence that we had confirming you registered as a homeschool parent with National Geographic Bee.
7. Your son reported that you and another District parent had the test answers for the National Geographic Bee contest so he was pulled out of the contest.
8. The academic dishonesty and cheating which you and your children engaged put all of the District students participating in the contest and the District at risk of being banned from current and future National Geographic Bee contests.
9. The Director of the National Geographic Bee indicated that in light of the significant misconduct, eliminating the participation of your children in the contest would allow the District to stay in good standing with the National Geographic Bee and continue to participate in future contests. She further indicated that eliminating your children from present and future competitions would allow the other District students to stay in good standing.
10. The Director of the National Geographic Bee stated that "this is the worst story I have heard in 15 years of working at the Bee. I have heard some colorful parent behaviors, but never to this extent of deception. I have spoken with the National Geographic Bee Vice President and have determined that we now need to change all protocols and review our process for homeschools."

The findings of my investigation yielded a clear picture of intentional academic dishonesty and unethical behaviors harmful to the District, its students and your children. You have made decisions which undermine the success and achievement of this District and all of our students who work so hard and approach educational endeavors with integrity. Based on the fraudulent and deceitful practices in which you engaged and the dishonor that you have brought upon our school, District, teachers and students, the District must take appropriate measures to address your misconduct and the academic dishonesty and cheating which occurred. Your behavior has put all of the District students who participate in the contest at risk for future participation. Furthermore your behavior and misconduct have tainted the reputation of the District and our hard working students. Based on such and the above outlined findings, the District is immediately instituting the following sanctions for your unethical behaviors:

1. Your children are no longer permitted to participate in any Butler 53 School District academic contests and/or competitions, team or individual, while they are students within the District. Your children can still participate in after school clubs, activities and extracurricular activities that do not have an academic contest and/or competition component.
2. You are not permitted to serve in any capacity as a parent volunteer in any school related contests and/or competitions. We cannot have you associated with representing the District or any of our schools in light of the deceptive behavior in which Mrs. Julka engaged.

If you have any questions or if the findings or sanctions outlined in this letter are not clear to you or your children, please do not hesitate to contact me. Butler School District 53 is committed to ensuring student success and accomplishments based upon ethical practices of the student and parent. Academic dishonesty and cheating will not be tolerated in any form. Please review the attached statement related to academic dishonesty.

Sincerely,

Heidi A. Wennstrom

Heidi A. Wennstrom, Ph.D; Ed.D

Superintendent

EXHIBIT 12

Butler 53
School District

2801 York Road
Oak Brook, Illinois 60523-2399

Board of Education and
Administrative Center
2801 York Road
Telephone: 630-573-2887
FAX: 630-573-5374

Butler Junior High School
2801 York Road
Telephone: 630-573-2760
FAX: 630-573-5374

Brook Forest School
60 Regent Drive
Telephone: 630-325-6888
FAX: 630-325-8452

www.Butler53.com

February 8, 2016

Dear Dr. and Mrs. Julka,

When reviewing the evidence and concerns I had related to the investigation of academic dishonesty, I want to share the following thoughts with you. I hope this will help clarify why the situation is being taken very seriously. Please know that I want Rohan and Aarav to continue to develop into well-rounded, successful young men.

Our investigation revealed many forms of academic dishonesty. Cheating in its simplest form is obtaining a copy of a test prior to the test date with intent to use that information to better one's outcome on that test. This applies to classroom tests as well as all National academic contests from the various entities that the District associates with. We have clear evidence of your falsified registration to gain the contest materials for the National Geographic Bee. You admitted to creating a false account with National Geographic Bee under the misrepresentation of being a home school using the false name and address of your brother. You eldest son also confirmed that you received the official contest materials in advance of the contest. While you did not seem to believe that dishonestly obtaining the exact contest questions in advance of the contest was considered cheating during our meeting, I hope that you have reconsidered that point of view. The District submits scores on behalf of the student participants. The teacher sponsor, school name and District name are associated with the integrity of the results submitted. Through our participation as a District, we certify the accuracy of the results. These are the reasons we cooperated fully with the contest providers to report the abuse. Obtaining contest materials prior to the contest is dishonest, even more so when falsifying yourself as a "homeschool" when your student is participating in the contest as a student enrolled in a public school. These findings were confirmed by the owner of the contest. Another form of academic dishonesty is knowingly sharing or facilitating access to materials for the purpose of providing your child with an academic advantage. While we are glad that you made the decision to pull your sons out of the contest, such does not mean you did not engage in academic dishonesty. Additionally, you were involved in sharing the official contest materials and questions with another family resulting in a student cheating on a District sponsored academic contest. Academic dishonesty through deception, misrepresentation, misstatement, or being uncooperative in an investigation also represent an attempt to cover up one's actions.

These behaviors associated with academic dishonesty will not be tolerated, as they discredit the accomplishments, achievements, and efforts of the Butler 53 students, staff and families who approach their academic career through honesty, hard work and studying. Your actions have brought dishonor to your school district, school, and your own family. Your family, and another family who engaged in similar academic dishonesty, seemed to find blame on a separate family, who was investigated and exonerated of all wrongdoing.

Academic dishonesty can be very harmful for children. When a student observes a parent's obsession with success, the student is far less likely to have positive self esteem and internal motivation to succeed for the joy of learning or development of self. Rather, it may be viewed as the only way to truly measure up to a parent's expectations. As a child development specialist, I ask you to consider these ideas and to reassess how you might help your sons to develop personal self esteem and integrity, based upon your future decisions and modeling. An unhealthy pursuit of contest wins can cause a pressure cooker inside that hurts, not helps, your children's prospects for success. Children in these circumstances may tend to equate winning as a primary indicator of their self-worth. It may also become a needed stamp of approval for a child to feel worthy in the eyes of their parent. Further, an approach such as this may lead to a learned helplessness and reduced internal motivation/effort, as a child begins to defer school work in order to rely heavily upon a parent's help more than on his own confidence and abilities for success.

The way children learn values, simply put, is by observing what we do as parents, and drawing conclusions about what a parent thinks is important in life. Regardless of what you consciously teach them, your child will emerge from childhood with clear views on what you as parents really value. I encourage you to prize honesty and find merit in your children's personal (not falsified) accomplishments.

I wish to counsel you to take a higher moral ground in your approach to the educational attainments for your children. I ask that you consider your actions to determine if they really helped you achieve your goals. Is a child better off knowing every answer so he can win, or could a prize accomplishment be one in which a child truly accomplished it through one's intelligence, ingenuity and hard work? For a student it can be very rewarding to do well knowing that you have done your best with the assurance that your parent's approval and support are solidly behind you regardless of the outcome, rather than achieving a false accomplishment achieved dishonestly that is publicly recognized above all other students.

Finally, I think one of the keys to parenting with integrity is a willingness to admit when we are wrong and that we have made an error in judgment. This is a powerful lesson. Children can learn much through the way we respond after we have made a poor choice. Part of parenting is making mistakes, and how we handle that is a great instructor. If we deny, get angry and cover up, we can bet our children will learn to do the same. But if we get down on eye-level and say, "I'm sorry, I did the wrong thing," our children will have walked through an important moment with us. Hopefully, it will be a seed planted in their hearts that will bear fruit of integrity in their own lives.

These comments are sent with respect knowing that your family intends to do everything possible to ensure that your sons flourish.

Sincerely,

Heidi A. Wennstrom

Heidi A. Wennstrom, Pd.D.; Ed.D.

Superintendent

EXHIBIT 13

Gmail

Rahul Julka <rjulkamd@gmail.com>

District 53 Academic Integrity

1 message

Butler School District 53 Administrative Center <vgalvin@butler53.com> Mon, Feb 8, 2016 at 4:01 PM
Reply-To: vgalvin@butler53.com
To: rjulkamd@gmail.com

Dear District 53 Families,

The District recently concluded an extensive investigation regarding isolated incidents of academic dishonesty by District parents involving outside academic contests in which the District participates.

In mid-January, the District became aware of possible parent dishonesty regarding the National Geographic Bee contest. The District immediately initiated a thorough investigation into the matter, which ultimately led to an additional report of parent academic dishonesty involving the WordMasters Challenge academic contest. Both the National Geographic Bee and WordMasters Challenge were promptly notified by the District of the academic dishonesty allegations and both organizations cooperated and contributed to the investigation.

As part of the District's investigatory process, parents identified during the course of the investigation as potentially having engaged in academic dishonesty were investigated and two parents were ultimately found to have participated in academic dishonesty with regard to these two outside academic contests in which District 53 participates, with a third party being cleared of any wrongdoing. As a result of the District's investigation and findings, the District has taken swift, appropriate and responsive action and implemented severe restrictions on those who engaged in academic dishonesty practices.

District 53 has a long-standing reputation of academic excellence built upon exceptional teaching and parental support. These instances of academic dishonesty by a couple parents cast a shadow on the District's reputation and could potentially lead others to question the integrity of our achievement results. The contests involved have stated that the District may continue to participate in their contests since they were immediately notified by and received the full cooperation of the District, and since the District has ensured them that appropriate actions have been taken with regard to those involved. These academic contests have also indicated that in light of this type of academic dishonesty, they will be introducing changes to their practices to assist in preventing fraudulent and academically dishonest use of their websites. Other outside academic contests in which the District participates were also investigated to ensure the results of District students were valid.

The District regards our academic integrity to be of the highest priority. As such, if there are any other incidents of this nature, the District will seek maximum sanctions against those involved and may decide to voluntarily withdraw the District from all such academic contests for a period of time.

Sincerely,

Heidi A. Wennstrom

Heidi A. Wennstrom, Ph.D; Ed.D.

Superintendent

This e-mail has been sent to you by BUTLER SCHOOL DISTRICT 53. To maximize their communication with you, you may be receiving this e-mail in addition to a phone call with the same message. If you no longer wish to receive email notifications from BUTLER SCHOOL DISTRICT 53, please click here to unsubscribe.

EXHIBIT 14

Subject: FW: Academic Honesty

From: **Heidi Wennstrom** <hwennstrom@butler53.com>
Date: Mon, Feb 8, 2016 at 5:04 PM
Subject: Academic Honesty
To: Rahma Hasan [redacted], Carol Katsis [redacted], Kristen Bendera [redacted], Shalini Kumar [redacted], Rukhaya AliKhan [redacted], Sylvia Ryerson [redacted], Jazel Moreno [redacted] Teena Rajan [redacted]
Cc: Kelly Voliva <kvoliva@butler53.com>, Amy Read <aread@butler53.com>

Dear PTO Executive Board Members,

This afternoon an all parent email went out to advise the parent community of our investigation into allegations of parent misconduct and academic dishonesty. Unfortunately, our investigation as you now know led to the findings that two families were involved. I ask that you do everything in your power to keep the story quiet amidst parent dialogue and gossip. I want to protect the identity of the families and children. I will need your help with this, as it will be a difficult story to contain.

I am aware that parents may contact you to see if they can elicit a better understanding of the situation or to find out as many details about the incidents as possible. I am asking for your cooperation in sticking to the following talking points:

- Specific information about the report sent to parents was not shared with me.
- I am unable to comment, but I am happy to refer you to Dr. Wennstrom or Mrs.Voliva, as they may be in the best position to answer your questions.
- It is my understanding that the problem was extremely isolated and very unfortunate.
- I believe in the integrity of our student learning outcomes and am glad to know the District is responsive to ensuring the integrity of our results.

Exec Board Members, please know that I wish this situation had not occurred, but unfortunately we are taking a firm stand to ensure that the quality instructional program and integrity of our achievement and contest results is upheld. I further ask, that you refrain from any and all discussion related to this matter to ensure the privacy of the individuals involved.

Thank you for your help. You are an awesome group to work with.
Heidi

--

Heidi Wennstrom, Ph.D, Ed.D
Superintendent
Butler School District 53
2801 York Road
Oak Brook, Illinois 60523

(630) 573-2887
(630) 573-5374 (fax)

EXHIBIT 15

Subject: FW: Academic Honesty D53 Parent Letter to Go Out Today
Attachments: Final D53 Parent Letter RE Academic Dishonesty 2.8.16.docx

From: **Heidi Wennstrom** <hwennstrom@butler53.com>
Date: Mon, Feb 8, 2016 at 3:07 PM
Subject: Academic Honesty D53 Parent Letter to Go Out Today
To: "allstaff@butler53.com" <allstaff@butler53.com>

Dear Faculty and Staff,

I am sorry to share with you that we have been undergoing an internal investigation related to an academic honesty situation involving a couple of parents. The investigation is now complete. I will be sending out a parent letter to the D53 families at both schools this afternoon.

I am aware that parents may contact you to see if they can elicit a better understanding of the situation or to find out as many details about the incidents as possible. I am asking for your cooperation in sticking to the following talking points:

- Specific information about the report sent to parents was not shared with me.
- I am unable to comment, but I am happy to refer you to Dr. Wennstrom or Mrs. Voliva, as they may be in the best position to answer your questions.
- It is my understanding that the problem was extremely isolated and very unfortunate.
- I believe in the integrity of our student learning outcomes and am glad to know the District is responsive to ensuring the integrity of our results.

Colleagues, I wish this situation had not occurred, but unfortunately we are taking a firm stand to ensure that the quality instructional program and integrity of our achievement and contest results is being upheld. I further ask, that you refrain from any and all discussion related to this matter to ensure the privacy of the individuals involved.

Thank you for your help.
Heidi

--

Heidi Wennstrom, Ph.D, Ed.D
Superintendent

Butler School District 53
2801 York Road
Oak Brook, Illinois 60523

(630) 573-2887
(630) 573-5374 (fax)

EXHIBIT 16

●○○○○ T-Mobile Wi-Fi 2:10 AM 65%

Search

From: No-reply@travelcenter.re... Hide

To: Komal Julka

Citi ThankYou Rewards: Travel Reservation Center Trip ID # 16744062

October 3, 2015 at 10:33 PM

CONNEXIONS LOYALTY — thankyou from citi

Dear **RAHUL JULKA**,

Thank you for booking your travel through **Connexions Loyalty**SM **Travel Center for Citi ThankYou® Rewards.** This email serves as your Itinerary. Please carefully review the information below and notify the Connexions LoyaltySM Travel Center for ThankYou® Rewards of any errors or discrepancies. Any fees incurred due to a reissue of this itinerary will be the responsibility of the traveler. All voluntary changes at any time are subject to airline/agency/program rules and penalties.

Your Trip ID is: **16744062**

You'll need Adobe's Acrobat Reader Version 5.0 or higher to view select links within this email. Click here to download Acrobat Reader from Adobe for free.

Please review your itinerary for any important information that may need to be printed.

Best regards,
ThankYou® Rewards

Your Reservation Status

Item	**Status**
Flight: ORD > MCO > ORD (Jan 22, 2016 - Jan 27, 2016)	Confirmed

Flight **ORD > MCO > ORD (Jan 22, 2016 - Jan 27, 2016)** **76,480 Points**

Passenger 1	**Rahul N Julka**
Passenger 2	**Komal R Julka**
Passenger 3	**Rohan R Julka**
Passenger 4	**Aarav R Julka**

AA #154 Economy BOEING 737-800	**Departure:** Fri, Jan 22, 2016 **6:50 PM** O'Hare International Airport, Chicago, IL (ORD)	**Arrival:** Fri, Jan 22, 2016 **10:33 PM** Orlando International Airport, Orlando, FL (MCO)	Non-stop	2hr 43min
AA #1192 Economy BOEING 737-800	**Departure:** Wed, Jan 27, 2016 **7:23 PM** Orlando International Airport, Orlando, FL (MCO)	**Arrival:** Wed, Jan 27, 2016 **9:15 PM** O'Hare International Airport, Chicago, IL (ORD)	Non-stop	2hr 52min

Airline Reference Number: **JXWGFT** Agency Reference Number: **N85A3W**

Payment Option(s)	**Points + Cash**
Air Reward	76,480 Points

Rules and Policies

EXHIBIT 17

Gmail

Rahul Julka <rjulkamd@gmail.com>

Grievance concerning recent disciplinary sanctions

1 message

Rahul Julka <rjulkamd@gmail.com> Thu, Feb 11, 2016 at 9:54 AM
To: ahanzlik@comcast.net
Cc: h.c.patel@hotmail.com, Alan Kumar <alankumar@yahoo.com>, rajivkadvani@hotmail.com, escchicago@aol.com, paskalides@hotmail.com, toddrusteberg@gmail.com
Bcc: Rahul Julka <rjulkamd@gmail.com>, komal julka <kjulka57@gmail.com>

Dear Mr. Hanzlik,

My wife Komal and I are writing this email to inquire about the process of filing a grievance concerning recent disciplinary sanctions placed against our children at Brook Forest Elementary by Dr. Heidi Wennstrom and Mrs. Kelly Voliva. We feel strongly that the purported investigation surrounding the events leading to the sanctions was inaccurate, misrepresentative, and handled poorly as well as unprofessionally. As we are unclear re: the process of how to file our grievance, we decided to reach out to the Board of Education for guidance so we can go through the appropriate channels to try and resolve this matter. We have also forwarded this email to the other members of the Board, as we were unsure whether one specific Board member may oversee grievances. We look forward to hearing from you soon. We can be reached at the contact information below.

With regards,

Rahul and Komal Julka

Komal cell: 630-806-6112
Komal email: kjulka57@gmail.com

Rahul cell: 630-306-6460
Rahul email: rjulkamd@gmail.com

Rahul N. Julka, M.D.
Gastroenterology and Transplant Hepatology
Dalal Medical Corporation
5825 Broadway Suite B
Merrillville, IN 46410
219-981-9000

EXHIBIT 18

Kelly Voliva <kvoliva@butler53.com>

Fwd: Grievance concerning recent disciplinary sanctions

1 message

Heidi Wennstrom <hwennstrom@butler53.com> Thu, Feb 11, 2016 at 12:09 PM
To: Kelly Voliva <kvoliva@butler53.com>, Amy Read <aread@butler53.com>

FYi, We received the following uniform grievance from the Julka family. [redacted]

Exhibit 18

---------- Forwarded message ----------
From: <ahanzlik@comcast.net>
Date: Thu, Feb 11, 2016 at 9:57 AM
Subject: Fwd: Grievance concerning recent disciplinary sanctions
To: Heidi Wennstrom <hwennstrom@butler53.com>

[redacted]

----- Forwarded Message -----
From: "Rahul Julka" <rjulkamd@gmail.com>
To: ahanzlik@comcast.net
Cc: "h c patel" <h.c.patel@hotmail.com>, "Alan Kumar" <alankumar@yahoo.com>, rajivkadvani@hotmail.com, escchicago@aol.com, paskalides@hotmail.com, toddrusteberg@gmail.com
Sent: Thursday, February 11, 2016 9:54:22 AM
Subject: Grievance concerning recent disciplinary sanctions

Dear Mr. Hanzlik,

My wife Komal and I are writing this email to inquire about the process of filing a grievance concerning recent disciplinary sanctions placed against our children at Brook Forest Elementary by Dr. Heidi Wennstrom and Mrs. Kelly Voliva. We feel strongly that the purported investigation surrounding the events leading to the sanctions was inaccurate, misrepresentative, and handled poorly as well as unprofessionally. As we are unclear re: the process of how to file our grievance, we decided to reach out to the Board of Education for guidance so we can go through the appropriate channels to try and resolve this matter. We have also forwarded this email to the other members of the Board, as we were unsure whether one specific Board member may oversee grievances. We look forward to hearing from you soon. We can be reached at the contact information below.

With regards,

Rahul and Komal Julka

Komal cell: 630-806-6112
Komal email: kjulka57@gmail.com

Rahul cell: 630-306-6460
Rahul email: rjulkamd@gmail.com

Rahul N. Julka, M.D.
Gastroenterology and Transplant Hepatology
Dalal Medical Corporation
5825 Broadway Suite B
Merrillville, IN 46410
219-981-9000

--

Heidi Wennstrom, Ph.D, Ed.D
Superintendent

Butler School District 53
2801 York Road
Oak Brook, Illinois 60523

(630) 573-2887
(630) 573-5374 (fax)

EXHIBIT 19

Heidi Wennstrom <hwennstrom@butler53.com>

Response to Parent Grievance

5 messages

Heidi Wennstrom <hwennstrom@butler53.com> Thu, Feb 11, 2016 at 4:36 PM
To: alan hanzlik <ahanzlik@comcast.net>, Liz Chun [redacted]

Alan, please consider the response below. [redacted]

2 attachments

Polciy 1400 Current .pdf
154K

Policy 1400 Language Updates in Process.pdf
174K

ahanzlik@comcast.net <ahanzlik@comcast.net> Thu, Feb 11, 2016 at 5:12 PM
To: Heidi Wennstrom <hwennstrom@butler53.com>
Cc: "Chun, Liz" [redacted]

EXHIBIT 20

School Board

Uniform Grievance Procedure

Students, parents/guardians, employees, or community members should notify any District Complaint Manager if they believe that the School Board, its employees, or agents have violated their rights guaranteed by the State or federal Constitution, State or federal statute, or Board policy, or have a complaint regarding:

1. Title II of the Americans with Disabilities Act;
2. Title IX of the Education Amendments of 1972;
3. Section 504 of the Rehabilitation Act of 1973;
4. Individuals With Disabilities Education Act, 20 U.S.C. § 1400 et seq.;
5. Title VI of the Civil Rights Act, 42 U.S.C. § 2000d et seq.;
6. Equal Employment Opportunities Act (Title VII of the Civil Rights Act), 42 U.S.C. § 2000e et seq.;
7. Sexual harassment (Illinois Human Rights Act, Title VII of the Civil Rights Act of 1964, and Title IX of the Education Amendments of 1972);
8. The misuse of funds received for services to improve educational opportunities for educationally disadvantaged or deprived children;
9. Curriculum, instructional materials, programs;
10. Victims' Economic Security and Safety Act, P.A. 93-591;
11. Illinois Equal Pay Act of 2003, 820 ILCS 112
12. Provision of services to homeless students, or
13. Illinois Whistleblower Act, 740 ILCS 174/1 et seq.

The Complaint Manager will attempt to resolve complaints without resorting to this grievance procedure and, if a complaint is filed, to address the complaint promptly and equitably. The right of a person to prompt and equitable resolution of a complaint filed hereunder shall not be impaired by the person's pursuit of other remedies. Use of this grievance procedure is not a prerequisite to the pursuit of other remedies and use of this grievance procedure does not extend any filing deadline related to the pursuit of other remedies. All deadlines may be extended by the Complaint Manager as he or she deems appropriate. As used in this policy, "school business days" means days on which the District's main office is open.

1. Filing a Complaint

   A person (hereinafter Complainant) who wishes to avail him or herself of this grievance procedure may do so by filing a complaint with any District Complaint Manager. The Complainant shall not be required to file a complaint with a particular Complaint Manager and may request a Complaint Manager of the same gender. The Complaint Manager may request the Complainant to provide a written statement regarding the nature of the complaint or require a meeting with the parent(s)/guardian(s) of a student. The Complaint Manager shall assist the Complainant as needed.

2. Investigation

   The Complaint Manager will investigate the complaint or appoint a qualified person to undertake the investigation on his or her behalf. If the Complainant is a student, the Complaint Manager will notify his or her parent(s)/guardian(s) that they may attend any investigatory meetings in which their child is involved. The complaint and identity of the Complainant will not be disclosed except: (1) as required by law, this policy, or (2) as necessary to fully investigate the complaint, or (3) as authorized by the Complainant.

   The identity of any student witnesses will not be disclosed except: (1) as required by law or any collective bargaining agreement, or (2) as necessary to fully investigate the complaint, or (3) as authorized by the parent/guardian of the student witness, or by the student if the student is 18 years of age or older.

Within 30 school business days of the date the complaint was filed, the Complaint Manager shall file a written report of his or her findings with the Superintendent. The Complaint Manager may request an extension of time. If a complaint of sexual harassment contains allegations involving the Superintendent, the written report shall be filed with the School Board, which will make a decision in accordance with Section 3 of this policy. The Superintendent will keep the Board informed of all complaints.

3. Decision and Appeal

Within 5 school business days after receiving the Complaint Manager's report, the Superintendent shall mail his or her written decision to the Complainant by U.S. mail, first class, as well as the Complaint Manager.

Within 10 school business days after receiving the Superintendent's decision, the Complainant may appeal the decision to the School Board by making a written request to the Complaint Manager. The Complaint Manager shall promptly forward all materials relative to the complaint and appeal to the School Board. Within 30 school business days, the School Board shall affirm, reverse, or amend the Superintendent's decision or direct the Superintendent to gather additional information for the Board. Within 5 school business days of the Board's decision, the Superintendent shall inform the Complainant of the Board's action. This grievance procedure shall not be construed to create an independent right to a School Board hearing. The failure to strictly follow the timelines in this grievance procedure shall not prejudice any party.

Appointing Complaint Managers

The Superintendent shall appoint at least two Complaint Managers, one of each gender. The District's Nondiscrimination Coordinator, if any, may be appointed a Complaint Manager. The Superintendent shall insert into this policy the names, addresses, and telephone numbers of current Complaint Managers.

Name	Mrs. Beth Mouw	Mr. John Baar
Address	60 Regent Drive	2801 York Road
	Oak Brook, IL 60523	Oak Brook, IL 60523
Telephone No.	630 325-6888	630 573-1725

LEGAL REF.:

Age Discrimination in Employment Act, 29 U.S.C. § 621 et seq.
Americans With Disabilities Act, 42 U.S.C. § 12101 et seq.
Equal Pay Act, 29 U.S.C. § 206(d).
Immigration Reform and Control Act, 8 U.S.C. § 1324a et seq.
Individuals With Disabilities Education Act, 20 U.S.C. § 1400 et seq.
McKinney Homeless Assistance Act, 42 U.S.C. § 11431 et seq.
Rehabilitation Act of 1973, 29 U.S.C. § 791 et seq.
Title VI of the Civil Rights Act, 42 U.S.C. § 2000d et seq.
Equal Employment Opportunities Act (Title VII of the Civil Rights Act), 42 U.S.C. § 2000e et seq.
Title IX of the Education Amendments, 20 U.S.C. § 1681 et seq.
Equal Pay Act of 2003, P.A. 93-0006.
Victims' Economic Security and Safety Act, 820 ILCS 180, 56 Ill.Admin Code Part 280
775 ILCS 5/1-101 et seq.
105 ILCS 5/2-3.8, 5/3-10, 5/10-20.7a, 5/10-22.5, 5/22-19, 5/24-4, 5/27.1, and 45/1-15.

23 Ill. Admin. Code §§ 1.240 and 200-40.
Illinois Whistleblower Act, 740 ILCS 174/1 et seq.

CROSS REF.: 3205 Compliance with Equal Employment Opportunity Act, 4075 Equal Employment Opportunity and Minority Recruitment, 4970 Sexual Harassment, 6020 Residency, 6125 Waiver of Student Fees, 6370 Sexual Harassment/Intimidation, 6935 Equal Educational Opportunities, 7215 Challenged Materials & Equipment, 7910 Exceptional Education Services, 7912 (Education of Homeless Children), 8070 Accommodating Individuals with Disabilities

Adopted: **03/08/04**

Revised: **03/10/08**

EXHIBIT 21

School Board

Uniform Grievance Procedure

A student, parent/guardian, employee, or community member should notify any District Complaint Manager if he or she believes that the School Board, its employees, or agents have violated his or her rights guaranteed by the State or federal Constitution, State or federal statute, or Board policy, or have a complaint regarding any one of the following:

1. Title II of the Americans with Disabilities Act
2. Title IX of the Education Amendments of 1972
3. Section 504 of the Rehabilitation Act of 1973
4. Title VI of the Civil Rights Act, 42 U.S.C. §2000d et seq.
5. Equal Employment Opportunities Act (Title VII of the Civil Rights Act), 42 U.S.C. §2000e et seq.
6. Sexual harassment (Illinois Human Rights Act, Title VII of the Civil Rights Act of 1964, and Title IX of the Education Amendments of 1972)
7. Bullying, 105 ILCS 5/27-23.7
8. Misuse of funds received for services to improve educational opportunities for educationally disadvantaged or deprived children
9. Curriculum, instructional materials, and/or programs
10. Victims' Economic Security and Safety Act, 820 ILCS 180
11. Illinois Equal Pay Act of 2003, 820 ILCS 112
12. Provision of services to homeless students
13. Illinois Whistleblower Act, 740 ILCS 174/
14. Misuse of genetic information (Illinois Genetic Information Privacy Act (GIPA), 410 ILCS 513/ and Titles I and II of the Genetic Information Nondiscrimination Act (GINA), 42 U.S.C. §2000ff et seq.
15. Employee Credit Privacy Act, 820 ILCS 70/

The Complaint Manager will first attempt to resolve complaints without resorting to this grievance procedure. If a formal complaint is filed under this procedure, the Complaint Manager will address the complaint promptly and equitably. A student and/or parent/guardian filing a complaint under this procedure may forego any informal suggestions and/or attempts to resolve it and may proceed directly to the grievance procedure. The Complaint Manager will not require a student or parent/guardian complaining of any form of harassment to attempt to resolve allegations directly with the accused (or the accused's parents/guardians); this includes mediation.

Right to Pursue Other Remedies Not Impaired

The right of a person to prompt and equitable resolution of a complaint filed hereunder shall not be impaired by the person's pursuit of other remedies, e.g., criminal complaints, civil actions, etc. Use of this grievance procedure is not a prerequisite to the pursuit of other remedies and use of this grievance procedure does not extend any filing deadline related to the pursuit of other remedies. If a person is pursuing another remedy subject to a complaint under this policy, the District will continue with a simultaneous investigation under this policy.

Deadlines

All deadlines under this procedure may be extended by the Complaint Manager as he or she deems appropriate. As used in this policy, *school business days* means days on which the District's main office is open.

Filing a Complaint

A person (hereinafter Complainant) who wishes to avail him or herself of this grievance procedure may do so by filing a complaint with any District Complaint Manager. The Complainant shall not be required to file a complaint with a particular Complaint Manager and may request a Complaint Manager of the same gender. The Complaint Manager may request the Complainant to provide a written statement regarding the nature of the complaint or require a meeting with a student's parent(s)/guardian(s). The Complaint Manager shall assist the Complainant as needed.

For bullying and cyber-bullying, the Complaint Manager shall process and review the complaint according to Board policy 6371, *Prevention of and Response to Bullying, Intimidation, and Harassment*, in addition to any response required by this policy.

Investigation

The Complaint Manager will investigate the complaint or appoint a qualified person to undertake the investigation on his or her behalf. The Complaint Manager shall ensure both parties have an equal opportunity to present evidence during an investigation. If the Complainant is a student under 18 years of age, the Complaint Manager will notify his or her parent(s)/guardian(s) that they may attend any investigatory meetings in which their child is involved. The complaint and identity of the Complainant will not be disclosed except: (1) as required by law, this policy, or (2) as necessary to fully investigate the complaint, or (3) as authorized by the Complainant.

The identity of any student witnesses will not be disclosed except: (1) as required by law or any collective bargaining agreement, or (2) as necessary to fully investigate the complaint, or (3) as authorized by the parent/guardian of the student witness, or by the student if the student is 18 years of age or older.

The Complaint Manager will inform, at regular intervals, the person(s) filing a complaint under this procedure about the status of the investigation. Within 30 school business days of the date the complaint was filed, the Complaint Manager shall file a written report of his or her findings with the Superintendent. The Complaint Manager may request an extension of time. If a complaint of sexual harassment contains allegations involving the Superintendent, the written report shall be filed with the Board, which will make a decision in accordance with the following section of this policy. The Superintendent will keep the Board informed of all complaints.

Decision and Appeal

Within 5 school business days after receiving the Complaint Manager's report, the Superintendent shall mail his or her written decision to the Complainant and the accused by first class U.S. mail as well as to the Complaint Manager. All decisions shall be based upon the *preponderance of evidence* standard.

Within 10 school business days after receiving the Superintendent's decision, the Complainant or the accused may appeal the decision to the Board by making a written request to the Complaint Manager. The Complaint Manager shall promptly forward all materials relative to the complaint and appeal to the Board. Within 30 school business days, the Board shall affirm, reverse, or amend the Superintendent's decision or direct the Superintendent to gather additional information. Within 5 school business days of the Board's decision, the Superintendent shall inform the Complainant and the accused of the Board's action.

This grievance procedure shall not be construed to create an independent right to a hearing before the Superintendent or Board. The failure to strictly follow the timelines in this grievance procedure shall not prejudice any party.

Appointing Nondiscrimination Coordinator and Complaint Managers

The Superintendent shall appoint a Nondiscrimination Coordinator to manage the District's efforts to provide equal opportunity employment and educational opportunities and prohibit the harassment of employees, students, and others. The Nondiscrimination Coordinator also serves as the District's Title IX Coordinator.

The Superintendent shall appoint at least one Complaint Manager to administer the complaint process in this policy. If possible, the Superintendent will appoint 2 Complaint Managers, one of each gender. The District's Nondiscrimination Coordinator may be appointed as one of the Complaint Managers.

The Superintendent shall insert into this policy and keep current the names, addresses, and telephone numbers of the Nondiscrimination Coordinator and the Complaint Managers.

Nondiscrimination Coordinator:

Amy Read – Principal BJH
Name
2801 York Road, Oak Brook, IL 60523
Address
aread@butler53.com
Email
630-573-5374
Telephone

Complaint Managers:

Alan Hanzlik	Heidi Wennstrom
Name	Name
2801 York Road, Oak Brook, IL 60523	2801 York Road, Oak Brook, IL 60523
Address	Address
boardofed@butler53.com	hwennstrom@butler53.com
Email	Email
630-573-5374	630-573-5374
Telephone	Telephone

LEGAL REF.:

Age Discrimination in Employment Act, 29 U.S.C. §621 et seq.
Americans With Disabilities Act, 42 U.S.C. §12101 et seq.
Equal Employment Opportunities Act (Title VII of the Civil Rights Act), 42 U.S.C. §2000e et seq.
Equal Pay Act, 29 U.S.C. §206(d).
Genetic Information Nondiscrimination Act, 42 U.S.C. §2000ff et seq.
Immigration Reform and Control Act, 8 U.S.C. §1324a et seq.
McKinney Homeless Assistance Act, 42 U.S.C. §11431 et seq.
Rehabilitation Act of 1973, 29 U.S.C. §791 et seq.
Title VI of the Civil Rights Act, 42 U.S.C. §2000d et seq.
Title IX of the Education Amendments, 20 U.S.C. §1681 et seq.
105 ILCS 5/2-3.8, 5/3-10, 5/10-20.7a, 5/10-22.5, 5/22-19, 5/24-4, 5/27-1, 5/27-23.7, and 45/1-15.
Illinois Genetic Information Privacy Act, 410 ILCS 513/.

Illinois Whistleblower Act, 740 ILCS 174/.
Illinois Human Rights Act, 775 ILCS 5/.
Victims' Economic Security and Safety Act, 820 ILCS 180, 56 Ill.Admin.Code Part 280.
Equal Pay Act of 2003, 820 ILCS 112/.
Employee Credit Privacy Act, 820 ILCS 70/.
23 Ill.Admin.Code §§1.240 and 200-40.

CROSS REF.: 4075 (Equal Employment Opportunity and Minority Recruitment), 4970 (Workplace Harassment Prohibited), 4001 (Hiring Process and Criteria), 7912 (Education of Homeless Children), 6935 (Equal Educational Opportunities), 6370 (Harassment of Students Prohibited), 6371 (Prevention of and Response to Bullying, Intimidation, and Harassment)

1st Reading February 8, 2016, Second Reading and Adoption March 14, 2016

EXHIBIT 22

Gmail

Rahul Julka <rjulkamd@gmail.com>

Parent Grievance

1 message

Rahul Julka <rjulkamd@gmail.com>
To: alan hanzlik <ahanzlik@comcast.net>

Tue, Feb 16, 2016 at 12:44 PM

Please see the attached letter of Grievance.

Rahul N. Julka, M.D.
Gastroenterology and Transplant Hepatology
Dalal Medical Corporation
5825 Broadway Suite B
Merrillville, IN 46410
219-981-9000

schoolletter.docx
134K

Saturday, February 13, 2016

Dear Mr. Hanzlik,

My wife Komal and I are writing this letter to pursue the process of filing a grievance concerning recent disciplinary sanctions placed against our children at Brook Forest Elementary School by Heidi Wennstrom and Kelly Voliva. We feel strongly that the purported investigation surrounding the events leading to the sanctions was inaccurate, misrepresentative, and handled poorly as well as unprofessionally.

The following is a brief written statement re: our concerns as per your request as our designated complaint manager.

The sanctions in question stem from the conclusion of the investigation into claims of academic dishonesty against our children. The claim of academic dishonesty was raised by another parent at the school, who reported that we were in possession of the exam questions for the 2016 National Geographic Bee competition.

The findings of the investigation concluded that we maliciously intended to cheat on the examination by purchasing the exam questions in a deceitful manner.

We are refuting this claim because as was explained during a face-to-face interview, the exam questions were purchased unknowingly by Komal's brother, Trushar Patel, whom we had entrusted with helping our children prepare for the National Geographic Bee exam. On reviewing the website, he had signed up for a home schooling account, thinking that this was effectively what he was doing for our children, in the hopes of obtaining study material and practice questions.

At no time, did he or we expect or understand that signing up for a home-schooling account would potentially grant access to the actual exam to be used in 2016. The address used for the home school was 325 Williams St, Roselle, IL. That is Trushar's home address, where any study material was to be sent. Despite explaining this, the school investigators accused Komal of making up her brother, and making up his home address. If we were trying to be deceitful in any way, we would obviously not have used our own personal credit card to pay for registration.

In addition to the above, we maintain that the investigation/findings reported to us by the school was filled with inconsistencies and inaccuracies.

*It was during a phone conversation with another parent on January 15, 2016 that the possibility of having the exam questions came up. The other parent asked Komal to recite some of the questions to her, which she did. At that point, the other parent became angry, agitated, and accused Komal of having the exam questions. After a discussion with Rahul when he got from work, we decided of our own accord to email Mrs. Traub, the National Geographic Bee co-ordinator for Brook Forest, to let her know that our children were withdrawing from the National Geographic Bee contest. We did this based on the possibility that we may have exam questions. This seemed to be the honorable thing to do. It was only during a meeting with the school a few days later that it was confirmed that the questions were in fact real. **That email to Mrs. Traub DID NOT cite a family wedding as the reason for withdrawal from the competition, which is what the school is stating. Our decision to withdraw our children had absolutely nothing to do with the influence or convincing of other parents, as also claimed by the school**.

*On Tuesday, January 19, 2016, the first day back to school after the holiday of Martin Luther King day, Komal approached and notified Kelly Voliva first thing in the morning that we may have accidentally downloaded material from the National Geographic Bee website that potentially could represent the upcoming exam questions and that we had pulled our children out of the contest. **Komal's meeting with Mrs. Voliva was NOT to complain about poor parent behavior, as asserted by the school; the meeting was to alert Mrs. Voliva re: possible compromise to the National Geographic Bee competition.**

We also feel that the manner in which the investigation was undertaken was handled poorly and was unprofessional.

*Later on the same day, January 19, 2016, Komal was called back in to the school office, where she met with Mrs. Voliva and Dr. Wennstrom again. This time, the meeting was in the presence of another parent at the school. Despite having originally come forward to Mrs. Voliva, and despite attempting to explain how the events came to be, Komal was accused of being a cheater, and was summarily dressed down and insulted by both Mrs. Voliva and Dr. Wennstrom in front of the other parent. Mrs. Voliva and Dr. Wennstrom apparently could not follow the events detailed by Komal, and they blamed Komal for being inaccurate, inconsistent, and deceitful, again in the presence of another parent at the school. The other parent blatantly lied to both Mrs. Voliva and Dr. Wennstrom when she stated that Komal did not recite any exam questions to her over the phone. At the end of the meeting, Komal was kicked off school grounds by Dr. Wennstrom, once again, in front of another parent.

*On February 2, 2016, Mrs. Voliva pulled our older son, Rohan, out of an exam to question him in her office. Neither Komal nor Rahul were aware of this meeting. Rohan had never seen nor heard a single question from the National Geographic material; the only discussion we had with him re: the contest was that he was not going to participate in it because we (Komal and Rahul) may have seen the questions already. Rohan told us about the meeting when he came home. He stated that he felt extremely uncomfortable and that Mrs. Voliva was speaking meanly to him, and he didn't understand what he had done wrong. He also told us that he felt as if Mrs. Voliva was accusing him of cheating in the upcoming Wordmasters competition because she asked him multiple times if he had the questions for that exam.

*Komal was asked over the phone last week by one of her friends re: the academic sanctions placed on our children. Not wanting to discuss this with another parent, Komal denied any sanctions were in place. The other parent stated that she was told by the original accuser that sanctions had been placed on our children, and what those sanctions were. This is a shocking, clear violation re: the privacy of our children and family that any disciplinary sanctions were discussed with another parent.

***Last, but no less important, is that at no point whatsoever, did either of our children engage in "academic dishonesty and cheating" as accused by the school. We voluntarily withdrew them from the exam and they in fact never saw nor heard a single exam question. To sanction them from participating in any school contest for their remaining time in District 53 is unfair and unjust.**

Please let us know if we can provide more details. We would both be more than willing to sit down and meet with you or any investigator chosen by you to look into our grievance.

We hope to hear from you soon.

Sincerely,

Rahul and Komal Julka

EXHIBIT 23

Gmail

Re: Parent Grievance

Rahul Julka <rjulkamd@gmail.com> Sun, Feb 14, 2016 at 11:10 AM
To: alan hanzlik <ahanzlik@comcast.net>

Hi Mr. Hanzlik,

thank you for getting back to us soon. As we prepare our written statement, a couple questions came up that we hope you can shed some light on. First of all, you mentioned that you would serve as our complaint manager but that you would designate a qualified individual to conduct any investigation. Would that qualified individual be someone employed by the school district, or a third party? Second, the process of filing a grievance seems to involve your findings being sent to the superintendent for review within 30 school business days of filing a grievance, with the superintendent giving a decision/ruling within 5 school business days after that. As we are filing grievance over a ruling of sanctions handed down by Superintendent Wennstrom, there is a conflict there, obviously. How is that to be avoided here? Thank you very much for your help.

Sincerely,
Rahul and Komal Julka

Rahul N. Julka, M.D.
Gastroenterology and Transplant Hepatology
Dalal Medical Corporation
5825 Broadway Suite B
Merrillville, IN 46410
219-981-9000

On Fri, Feb 12, 2016 at 10:20 AM, <ahanzlik@comcast.net> wrote:

> Dear Dr. and Mrs. Julka,
>
> Thank you for reaching out to me with your concern. I am attaching our Uniform Grievance Policy along with our updated policy work, which is currently in process for adoption in March, for your review. You have the right to a prompt and equitable resolution. I will serve as your Complaint Manager, but will designate a qualified individual to conduct the investigation on my behalf. To begin the process, I ask that you send to me a written statement of the nature of your concern along with the specific concerns that are to be addressed by us should an investigation be required. There are a number of steps that an investigation requires. We will begin promptly once in receipt of your written complaints if warranted.
>
> You can reach me in any of the following ways:
>
> Phone messages at 630-573-2887
>
> Written correspondence to:
>
> Mr. Alan Hanzlik, President
> Butler District 53 Board of Education
> 2801 York Road
> *Oak Brook, IL 60523*

ahanzlik@comcast.net

Sincerely,
Alan Hanzlik

EXHIBIT 24

Gmail

Rahul Julka <rjulkamd@gmail.com>

Re: Parent Grievance

1 message

ahanzlik@comcast.net <ahanzlik@comcast.net> Sun, Feb 14, 2016 at 7:06 PM
To: Rahul Julka <rjulkamd@gmail.com>

Dear Mr. Julka: I will use a third party not connected to the District or Board of Education. The Investigation does NOT flow through the Superintendant for a decision. The rules of an Investigation are very specific and are intended to provide a fair and impartial review of concerns. As the individual accountable for this review, I will do my best to complete this review carefully, fairly and factually. Should you have additional questions, please let me know.

EXHIBIT 25

Gmail

Rahul Julka <rjulkamd@gmail.com>

Re: Parent Grievance

1 message

Rahul Julka <rjulkamd@gmail.com> Sun, Feb 14, 2016 at 11:10 AM
To: alan hanzlik <ahanzlik@comcast.net>

Hi Mr. Hanzlik,

thank you for getting back to us soon. As we prepare our written statement, a couple questions came up that we hope you can shed some light on. First of all, you mentioned that you would serve as our complaint manager but that you would designate a qualified individual to conduct any investigation. Would that qualified individual be someone employed by the school district, or a third party? Second, the process of filing a grievance seems to involve your findings being sent to the superintendent for review within 30 school business days of filing a grievance, with the superintendent giving a decision/ruling within 5 school business days after that. As we are filing grievance over a ruling of sanctions handed down by Superintendent Wennstrom, there is a conflict there, obviously. How is that to be avoided here? Thank you very much for your help.

Sincerely,
Rahul and Komal Julka

Rahul N. Julka, M.D.
Gastroenterology and Transplant Hepatology
Dalal Medical Corporation
5825 Broadway Suite B
Merrillville, IN 46410
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>
> You can reach me in any of the following ways:
>
> Phone messages at 630-573-2887
>
> Written correspondence to:
>
> Mr. Alan Hanzlik, President
> Butler District 53 Board of Education
> 2801 York Road
> Oak Brook, IL 60523

EXHIBIT 26

Heidi Wennstrom <hwennstrom@butler53.com>

Letter

3 messages

---

ahanzlik@comcast.net <ahanzlik@comcast.net> Tue, Feb 16, 2016 at 2:42 PM
To: Heidi Wennstrom <hwennstrom@butler53.com>

Hi [redacted] I received the letter from Dr. Julka. [redacted]

Heidi Wennstrom <hwennstrom@butler53.com> Tue, Feb 16, 2016 at 3:41 PM
To: ahanzlik@comcast.net

[redacted]

Sent from my iPhone
[Quoted text hidden]

---

ahanzlik@comcast.net <ahanzlik@comcast.net> Tue, Feb 16, 2016 at 5:12 PM
To: Heidi Wennstrom <hwennstrom@butler53.com>

Thanks. Will do. [redacted]

EXHIBIT 27

Gmail

Rahul Julka <rjulkamd@gmail.com>

Receipt of Uniform Grievance Complaint and Proposal for a Resolution Meeting

1 message

Margaret Fisher <mfisher@robbins-schwartz.com> Thu, Feb 18, 2016 at 4:58 PM
To: "rjulkamd@gmail.com" <rjulkamd@gmail.com>, "kjulka57@gmail.com" <kjulka57@gmail.com>
Cc: "ahanzlik@comcast.net" <ahanzlik@comcast.net>, Caroline Roselli <croselli@robbins-schwartz.com>, Libby Massey <lmassey@robbins-schwartz.com>

Please see the attached on behalf of Ms. Libby Massey.

Margaret Fisher

Legal Secretary

Robbins Schwartz

55 W. Monroe St., Suite 800

Chicago, Illinois 60603-5144

p: 312.332.7760 f: 312.332.7768

mfisher@robbins-schwartz.com

Robbins Schwartz

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DOCS-#536726-v1-Ltr_to_Parents_2_18_16.PDF
273K

Robbins Schwartz

55 West Monroe, Suite 800 | Chicago, IL 60603-5144

LIBBY N. MASSEY
lmassey@robbins-schwartz.com

February 18, 2016

VIA EMAIL AND U.S. MAIL

Rahul and Komal Julka
717 St. Joseph Drive
Oak Brook, IL 60523
rjulkamd@gmail.com
kjulka57@gmail.com

Re: Receipt of Uniform Grievance Complaint and Proposal for a Resolution Meeting

Dear Dr. Rahul Julka and Mrs. Komal Julka,

The Board of Education for Butler School District No. 53 is in receipt of your uniform grievance complaint, filed on February 16, 2016. Butler School District No. 53 (hereinafter "the District") will process your complaint in accordance with its Uniform Grievance Procedure Policy 1400, which is enclosed for your reference.

In light of your complaint involving allegations and claims against District Administrators and per your correspondences with Board President Alan Hanzlik, in order to ensure a fair and impartial complaint investigation process the Board of Education has appointed me to serve as the Complaint Investigator to undertake the investigation promptly and equitably. I am an attorney with the law firm of Robbins Schwartz and am familiar with the Uniform Grievance Process. My investigation will involve interviews with relevant individuals, including both of you, as well as a review of any documents or information provided by you and/or the District Administration.

Pursuant to Board Policy 1400, I am interested in attempting to resolve the underlying complaint via a resolution meeting before proceeding with my investigation. In order to ensure an equitable and impartial process, I would propose that another attorney at Robbins Schwartz, Caroline Roselli, serve as the resolution facilitator. Present for a resolution session would be both of you, Superintendent Dr. Heidi Wennstrom, and Principal Kelly Voliva. Board President Alan Hanzlik will not be present at the resolution meeting, as it is important he remain impartial should the parties be unable to resolve the dispute since the final decision relative to your complaint is determined by the Board of Education. The purpose of the resolution meeting is to bring the relevant parties together to discuss the issues and concerns and see if there is a possibility of resolution before proceeding with the formal complaint investigation. At the resolution meeting, both parties to the dispute would have the opportunity to discuss their concerns, present any information they wish to share, and suggest options for resolution. Ms. Roselli would attempt to facilitate an agreement between your family and the District. If Ms. Roselli is unable to assist the parties in reaching a resolution of your complaint to which both sides agree, she will conclude the resolution meeting, and I will step in shortly thereafter to promptly conduct the formal investigation.

Robbins Schwartz

I encourage you to consider my proposal for a resolution meeting, as it is in the best interest of your family and the District to come to a mutual agreement to resolve the complaint before proceeding any further. If you are interested in participating in the resolution meeting, please provide me with dates and times of your availability over the next two weeks. If you are not interested in the resolution meeting, I will move forward with my investigation. Please inform me of your decision by Monday, February 22nd.

Very truly yours,

ROBBINS SCHWARTZ

Libby N. Massey

By: Libby N. Massey

LNM
Enclosure: Butler School District No. 53 Uniform Grievance Procedure Policy 1400

cc: Alan Hanzlik, Butler School District 53 Board of Education President
Caroline Roselli, Robbins Schwartz

EXHIBIT 28

Gmail Rahul Julka <rjulkamd@gmail.com>

Re: Receipt of Uniform Grievance Complaint and Proposal for a Resolution Meeting

1 message

Rahul Julka <rjulkamd@gmail.com> Mon, Feb 22, 2016 at 1:09 PM
To: Libby Massey <lmassey@robbins-schwartz.com>
Cc: Caroline Roselli <croselli@robbins-schwartz.com>, "ahanzlik@comcast.net" <ahanzlik@comcast.net>, "kjulka57@gmail.com" <kjulka57@gmail.com>

Dear Ms. Massey,

thank you for your email/letter. My wife and I are agreeable to an attempt at resolution through a meeting as you suggested. I did have a couple of questions re: setting up the date and time for the meeting.

1) will this meeting be at your office?
2) do you have a ballpark estimate re: how long this meeting might last?
3) would the meeting be daytime during the week, or are weekends/nights a possibility?

The reason I am asking the above is because I work in Northwest Indiana, I want to have a clear schedule for the day of the meeting, and I want to give my partners as much notice as possible that I will be gone the day of the meeting. In general, during the week, Monday and Tuesday would work best for me, with Thursday another option.

Thank you for your time in advance and for helping us to try resolving this issue.

Sincerely,

Rahul N. Julka

Rahul N. Julka, M.D.
Gastroenterology and Transplant Hepatology
Dalal Medical Corporation
5825 Broadway Suite B
Merrillville, IN 46410
219-981-9000

On Thu, Feb 18, 2016 at 4:58 PM, Margaret Fisher <mfisher@robbins-schwartz.com> wrote:

> Please see the attached on behalf of Ms. Libby Massey.
>
> **Margaret Fisher**
>
> Legal Secretary
>
> Robbins Schwartz
>
> 55 W. Monroe St., Suite 800
>
> Chicago, Illinois 60603-5144
>
> p: 312.332.7760 f: 312.332.7768
>
> mfisher@robbins-schwartz.com

Robbins Schwartz

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EXHIBIT 29

Gmail

Rahul Julka <rjulkamd@gmail.com>

RE: Receipt of Uniform Grievance Complaint and Proposal for a Resolution Meeting

1 message

Libby Massey <lmassey@robbins-schwartz.com> Tue, Feb 23, 2016 at 9:44 AM
To: Rahul Julka <rjulkamd@gmail.com>
Cc: Caroline Roselli <croselli@robbins-schwartz.com>, "kjulka57@gmail.com" <kjulka57@gmail.com>

Dr. and Mrs. Julka,

Thank you for your email. I am pleased to hear you are interested in attempting to resolve this dispute through a resolution meeting. These types of meetings typically do not run longer than a half-day, so I'd set aside about three hours. As for the venue, for the convenience of the parties, the meeting can occur at Butler School District. If, however, you prefer a different location, please advise and I will investigate options.

Based on your availability, Caroline Roselli, Resolution Facilitator, and Dr. Wennstrom and Mrs. Voliva are available on the following dates and times for the resolution meeting:

- Monday, February 29th at 9:00 a.m.
- Monday, February 29th at 12:00 p.m.
- Wednesday, March 2nd at 4:00 p.m. (or at 5:00 p.m., if that is better for your family)

Please let me know which dates, if any, work for your family. If none of the above dates work, we will look into the next week. Thank you.

Libby N. Massey

Attorney

Robbins Schwartz

55 W. Monroe St. Suite 800

Chicago, Illinois 60603-5144

p: 312.332.7760 f: 312.332.7768

lmassey@robbins-schwartz.com

EXHIBIT 30

Gmail

Rahul Julka <rjulkamd@gmail.com>

Re: Receipt of Uniform Grievance Complaint and Proposal for a Resolution Meeting

Rahul Julka <rjulkamd@gmail.com> Thu, Feb 25, 2016 at 7:23 AM
To: Libby Massey <lmassey@robbins-schwartz.com>
Cc: Caroline Roselli <croselli@robbins-schwartz.com>, "kjulka57@gmail.com" <kjulka57@gmail.com>

Ms. Massey and Ms. Roselli,

I am unavailable Wednesdays. Mondays and Tuesdays are better for me, but I can not do Monday Feb 29 as I need some more notice/time to have my patients' procedures rescheduled particularly since I will have added procedures for Monday Feb 29 due to the inclement weather yesterday that caused cancellations. How about the following week, Monday 3/7/16 or Tuesday 3/8/16? Those dates should work.

Thank you again,

Rahul N. Julka

Rahul N. Julka, M.D.
Gastroenterology and Transplant Hepatology
Dalal Medical Corporation
5825 Broadway Suite B
Merrillville, IN 46410
219-981-9000

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> Please let me know which dates, if any, work for your family. If none of the above dates work, we will look into the next week. Thank you.

EXHIBIT 31

Gmail

Rahul Julka <rjulkamd@gmail.com>

RE: Receipt of Uniform Grievance Complaint and Proposal for a Resolution Meeting

1 message

Libby Massey <lmassey@robbins-schwartz.com> Thu, Feb 25, 2016 at 11:16 AM
To: Rahul Julka <rjulkamd@gmail.com>
Cc: Caroline Roselli <croselli@robbins-schwartz.com>, "kjulka57@gmail.com" <kjulka57@gmail.com>

Dr. and Mrs. Julka,

Thank you for your email. It looks like all parties are available on Monday, March 7th at 3:00 p.m. The meeting will take place at the Butler District Offices, unless you have any objection to this location. Again, Caroline Roselli will serve as the resolution facilitator. Also present at the meeting will be Mrs. Voliva and Dr. Wennstrom.

If you have any further questions, please let me know. Otherwise, Ms. Roselli will see you on the 7th.

Libby N. Massey

Attorney

Robbins Schwartz

55 W. Monroe St. Suite 800

Chicago, Illinois 60603-5144

p: 312.332.7760 f: 312.332.7768

lmassey@robbins-schwartz.com

Robbins Schwartz

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From: Rahul Julka [mailto:rjulkamd@gmail.com]
Sent: Thursday, February 25, 2016 7:24 AM
To: Libby Massey <lmassey@robbins-schwartz.com>
Cc: Caroline Roselli <croselli@robbins-schwartz.com>; kjulka57@gmail.com
Subject: Re: Receipt of Uniform Grievance Complaint and Proposal for a Resolution Meeting

Ms. Massey and Ms. Roselli,

I am unavailable Wednesdays. Mondays and Tuesdays are better for me, but I can not do Monday Feb 29 as I need some more notice/time to have my patients' procedures rescheduled particularly since I will have added procedures for Monday Feb 29 due to the inclement weather yesterday that caused cancellations. How about the following week, Monday 3/7/16 or Tuesday 3/8/16? Those dates should work.

Thank you again,

Rahul N. Julka

Rahul N. Julka, M.D.

Gastroenterology and Transplant Hepatology

Dalal Medical Corporation

5825 Broadway Suite B

Merrillville, IN 46410

219-981-9000

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> - Monday, February 29th at 12:00 p.m.

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Please let me know which dates, if any, work for your family. If none of the above dates work, we will look into the next week. Thank you.

Libby N. Massey

Attorney

Robbins Schwartz

55 W. Monroe St. Suite 800

Chicago, Illinois 60603-5144

p: 312.332.7760 f: 312.332.7768

lmassey@robbins-schwartz.com

Robbins Schwartz

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Sent: Monday, February 22, 2016 1:09 PM
To: Libby Massey <lmassey@robbins-schwartz.com>
Cc: Caroline Roselli <croselli@robbins-schwartz.com>; ahanzlik@comcast.net; kjulka57@gmail.com
Subject: Re: Receipt of Uniform Grievance Complaint and Proposal for a Resolution Meeting

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Thank you for your time in advance and for helping us to try resolving this issue.

Sincerely,

Rahul N. Julka

Rahul N. Julka, M.D.

Gastroenterology and Transplant Hepatology

Dalal Medical Corporation

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Merrillville, IN 46410

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Margaret Fisher

Legal Secretary

Robbins Schwartz

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Chicago, Illinois 60603-5144

p: 312.332.7760 f: 312.332.7768

mfisher@robbins-schwartz.com

Robbins Schwartz

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EXHIBIT 32

Gmail Rahul Julka <rjulkamd@gmail.com>

Re: Receipt of Uniform Grievance Complaint and Proposal for a Resolution Meeting

1 message

Rahul Julka <rjulkamd@gmail.com> Fri, Feb 26, 2016 at 7:32 PM
To: Libby Massey <lmassey@robbins-schwartz.com>
Cc: Caroline Roselli <croselli@robbins-schwartz.com>, "kjulka57@gmail.com" <kjulka57@gmail.com>

Hello,

that date and time work for us. Please send us the address where the meeting will be held. Thank you!

Rahul N. Julka

Rahul N. Julka, M.D.
Gastroenterology and Transplant Hepatology
Dalal Medical Corporation
5825 Broadway Suite B
Merrillville, IN 46410
219-981-9000

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> If you have any further questions, please let me know. Otherwise, Ms. Roselli will see you on the 7th.
>
> **Libby N. Massey**
>
> Attorney
>
> Robbins Schwartz
>
> 55 W. Monroe St. Suite 800
>
> Chicago, Illinois 60603-5144
>
> p: 312.332.7760 f: 312.332.7768
>
> lmassey@robbins-schwartz.com

Robbins Schwartz

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To: Libby Massey <lmassey@robbins-schwartz.com>
Cc: Caroline Roselli <croselli@robbins-schwartz.com>; kjulka57@gmail.com
Subject: Re: Receipt of Uniform Grievance Complaint and Proposal for a Resolution Meeting

Ms. Massey and Ms. Roselli,

I am unavailable Wednesdays. Mondays and Tuesdays are better for me, but I can not do Monday Feb 29 as I need some more notice/time to have my patients' procedures rescheduled particularly since I will have added procedures for Monday Feb 29 due to the inclement weather yesterday that caused cancellations. How about the following week, Monday 3/7/16 or Tuesday 3/8/16? Those dates should work.

Thank you again,

Rahul N. Julka

Rahul N. Julka, M.D.

Gastroenterology and Transplant Hepatology

Dalal Medical Corporation

5825 Broadway Suite B

Merrillville, IN 46410

219-981-9000

On Tue, Feb 23, 2016 at 9:44 AM, Libby Massey <lmassey@robbins-schwartz.com> wrote:

> Dr. and Mrs. Julka,

Thank you for your email. I am pleased to hear you are interested in attempting to resolve this dispute through a resolution meeting. These types of meetings typically do not run longer than a half-day, so I'd set aside about three hours. As for the venue, for the convenience of the parties, the meeting can occur at Butler School District. If, however, you prefer a different location, please advise and I will investigate options.

Based on your availability, Caroline Roselli, Resolution Facilitator, and Dr. Wennstrom and Mrs. Voliva are available on the following dates and times for the resolution meeting:

- Monday, February 29th at 9:00 a.m.
- Monday, February 29th at 12:00 p.m.
- Wednesday, March 2nd at 4:00 p.m. (or at 5:00 p.m., if that is better for your family)

Please let me know which dates, if any, work for your family. If none of the above dates work, we will look into the next week. Thank you.

Libby N. Massey

Attorney

Robbins Schwartz

55 W. Monroe St. Suite 800

Chicago, Illinois 60603-5144

p: 312.332.7760 f: 312.332.7768

lmassey@robbins-schwartz.com

Robbins Schwartz

This message is confidential. This message may also be privileged or protected by work product immunity or other laws and regulations. If you have received it by mistake, please re-send this communication to the sender and delete it from your system without copying it or disclosing its contents to anyone.

From: Rahul Julka [mailto:rjulkamd@gmail.com]
Sent: Monday, February 22, 2016 1:09 PM
To: Libby Massey <lmassey@robbins-schwartz.com>
Cc: Caroline Roselli <croselli@robbins-schwartz.com>; ahanzlik@comcast.net; kjulka57@gmail.com
Subject: Re: Receipt of Uniform Grievance Complaint and Proposal for a Resolution Meeting

Dear Ms. Massey,

thank you for your email/letter. My wife and I are agreeable to an attempt at resolution through a meeting as you suggested. I did have a couple of questions re: setting up the date and time for the meeting.

1) will this meeting be at your office?

2) do you have a ballpark estimate re: how long this meeting might last?

3) would the meeting be daytime during the week, or are weekends/nights a possibility?

The reason I am asking the above is because I work in Northwest Indiana, I want to have a clear schedule for the day of the meeting, and I want to give my partners as much notice as possible that I will be gone the day of the meeting. In general, during the week, Monday and Tuesday would work best for me, with Thursday another option.

Thank you for your time in advance and for helping us to try resolving this issue.

Sincerely,

Rahul N. Julka

Rahul N. Julka, M.D.

Gastroenterology and Transplant Hepatology

Dalal Medical Corporation

5825 Broadway Suite B

Merrillville, IN 46410

219-981-9000

On Thu, Feb 18, 2016 at 4:58 PM, Margaret Fisher <mfisher@robbins-schwartz.com> wrote:

> Please see the attached on behalf of Ms. Libby Massey.
>
> **Margaret Fisher**
>
> Legal Secretary
>
> Robbins Schwartz
>
> 55 W. Monroe St., Suite 800

Chicago, Illinois 60603-5144

p: 312.332.7760 f: 312.332.7768

mfisher@robbins-schwartz.com

Robbins Schwartz

This message is confidential. This message may also be privileged or protected by work product immunity or other laws and regulations. If you have received it by mistake, please re-send this communication to the sender and delete it from your system without copying it or disclosing its contents to anyone.

EXHIBIT 33

Gmail

Rahul Julka <rjulkamd@gmail.com>

RE: Receipt of Uniform Grievance Complaint and Proposal for a Resolution Meeting

Libby Massey <lmassey@robbins-schwartz.com> Mon, Feb 29, 2016 at 5:47 PM
To: Rahul Julka <rjulkamd@gmail.com>
Cc: Caroline Roselli <croselli@robbins-schwartz.com>, "kjulka57@gmail.com" <kjulka57@gmail.com>

Thank you, Dr. Julka. The meeting will take place at the Butler District Office, 2801 York Road, in Oak Brook.

Libby N. Massey

Attorney

Robbins Schwartz

55 W. Monroe St. Suite 800

Chicago, Illinois 60603-5144

p: 312.332.7760 f: 312.332.7768

lmassey@robbins-schwartz.com

Robbins Schwartz

This message is confidential. This message may also be privileged or protected by work product immunity or other laws and regulations. If you have received it by mistake, please re-send this communication to the sender and delete it from your system without copying it or disclosing its contents to anyone.

From: Rahul Julka [mailto:rjulkamd@gmail.com]
Sent: Friday, February 26, 2016 7:33 PM
To: Libby Massey <lmassey@robbins-schwartz.com>
Cc: Caroline Roselli <croselli@robbins-schwartz.com>; kjulka57@gmail.com
Subject: Re: Receipt of Uniform Grievance Complaint and Proposal for a Resolution Meeting

Hello,

that date and time work for us. Please send us the address where the meeting will be held. Thank you!

Rahul N. Julka

Rahul N. Julka, M.D.

Gastroenterology and Transplant Hepatology

Dalal Medical Corporation

5825 Broadway Suite B

Merrillville, IN 46410

219-981-9000

On Thu, Feb 25, 2016 at 11:16 AM, Libby Massey <lmassey@robbins-schwartz.com> wrote:

> Dr. and Mrs. Julka,
>
> Thank you for your email. It looks like all parties are available on Monday, March 7th at 3:00 p.m. The meeting will take place at the Butler District Offices, unless you have any objection to this location. Again, Caroline Roselli will serve as the resolution facilitator. Also present at the meeting will be Mrs. Voliva and Dr. Wennstrom.
>
> If you have any further questions, please let me know. Otherwise, Ms. Roselli will see you on the 7th.

Libby N. Massey

Attorney

Robbins Schwartz

55 W. Monroe St. Suite 800

Chicago, Illinois 60603-5144

p: 312.332.7760 f: 312.332.7768

lmassey@robbins-schwartz.com

Robbins Schwartz

This message is confidential. This message may also be privileged or protected by work product immunity or other laws and regulations. If you have received it by mistake, please re-send this communication to the sender and delete it from your system without copying it or disclosing its contents

EXHIBIT 34

Gmail

Rahul Julka <rjulkamd@gmail.com>

Resolution Meeting

1 message

Rahul Julka <rjulkamd@gmail.com> Wed, Mar 9, 2016 at 10:03 PM
To: alan hanzlik <ahanzlik@comcast.net>
Cc: Caroline Roselli <croselli@robbins-schwartz.com>
Bcc: komal julka <kjulka57@gmail.com>, Rahul Julka <rjulkamd@gmail.com>

Dear Mr. Hanzlik,

As you are aware, my wife and I met with Superintendent Wennstrom, Principal Voliva,and Ms.Roselli on Monday, March 7th for a resolution meeting re: the grievance that we filed. As my wife and I consider the settlement offer made to us by Superintendent Wennstrom, I wanted to send you this email to point out a few things re: how my wife and I feel about the whole process.

The first thing we learned, within the first couple minutes of sitting down, was that Ms. Roselli and her law firm have been hired by the School District to conduct the resolution meeting, and if needed, the investigation to make recommendations to the School Board. I had specifically asked you whether the investigator would be someone employed by the school district or a third party. You had replied that you will use a third party not connected to the School District or the Board of Education.

A few minutes later, Superintendent Wennstrom began speaking, and one of the first things that she told us was that the Board of Education was kept up to date with her investigation step by step through the process. She said that there were several Board of Education meetings dealing with our case, and at least one involved the entire Board. She told us that the Board had told her prior to the meeting that they did not want to reduce any of the sanctions placed against our children, but because she was interested in child development, she would work with us re: a proposed resolution, and then call you to get your approval re: a resolution. This struck us as very odd that prior to a resolution meeting, the Board of Education would tell their representative that they do not want to consider a resolution.

We were also concerned about Superintendent Wennstrom's statement to us that she had heard a recorded phone conversation between my wife and the accusing parent that had helped her make up her mind to believe the accuser over my wife. Some of the details told to us by Dr. Wennstrom re: this conversation did not seem to make much sense, and we asked her to let us hear the conversation. She told us that we could not as it was recorded by and in possession of the accuser's husband. When we asked whether there was any transcript of the phone conversation in question, she told us no. Without the ability to hear the conversation, and with no transcript made of the conversation, how can we possibly verify the validity or accuracy of something that played a role in the Superintendent's decision making process?

The words "equitable", "fair", and "impartial" were used multiple times to describe what the grievance process is all about. We are strongly concerned re: the issues above. On top of that, Ms. Massey's introduction letter to us stated that you were not going to be attending the resolution meeting so that you could remain impartial should a resolution not be found, as the Board of Education would determine the final decision relative to our complaint. If the Board of Education has already placed the sanctions against our children, and notified Superintendent Wennstrom that they do not want to reduce the sanctions, then how fair and impartial can this process be?

I have sent this email to Ms.Roselli via carbon copy, so that she can verify the accuracy of the above statements made during the meeting on Monday.

Thank you again for being our complaint manager in this process. We remain hopeful to work through this situation.

Sincerely,

Rahul N. Julka

Rahul N. Julka, M.D.
Gastroenterology and Transplant Hepatology
Dalal Medical Corporation
5825 Broadway Suite B
Merrillville, IN 46410
219-981-9000

EXHIBIT 35

Gmail

Rahul Julka <rjulkamd@gmail.com>

FOIA

1 message

Rahul Julka <rjulkamd@gmail.com> Tue, Mar 8, 2016 at 10:43 PM
To: vgalvin@butler53.com
Bcc: komal julka <kjulka57@gmail.com>, Rahul Julka <rjulkamd@gmail.com>

Hello Ms. Galvin,

please see attached re: a FOIA request.

Any questions, concerns, please let us know. Thank you in advance!

Rahul N. Julka 630-306-6460
Komal R. Julka 630-806-6112

Rahul N. Julka, M.D.
Gastroenterology and Transplant Hepatology
Dalal Medical Corporation
5825 Broadway Suite B
Merrillville, IN 46410
219-981-9000

---

3 attachments

District 53 Academic Integrity.html
410K

FOIA Request.pdf
883K

2.8.16 .pdf Julka Attachment.pdf
166K

EXHIBIT 36

Gmail

Rahul Julka <rjulkamd@gmail.com>

Re: FOIA

Vickie Galvin <vgalvin@butler53.com>
To: Rahul Julka <rjulkamd@gmail.com>

Wed, Mar 9, 2016 at 8:26 PM

Dr. Rahul,

We've received your email and two attachments, but there appears to be another attachment we cannot open (District 53 Academic Integrity.html). If it is relevant to your FOIA, could you please resend the attachment in another format, and we will process it accordingly.

Thank you,
Vickie Galvin
FOIA Officer

On Tue, Mar 8, 2016 at 8:43 PM, Rahul Julka <rjulkamd@gmail.com> wrote:

> Hello Ms. Galvin,
>
> please see attached re: a FOIA request.
>
> Any questions, concerns, please let us know. Thank you in advance!
>
> Rahul N. Julka 630-306-6460
> Komal R. Julka 630-806-6112
>
> Rahul N. Julka, M.D.
> Gastroenterology and Transplant Hepatology
> Dalal Medical Corporation
> 5825 Broadway Suite B
> Merrillville, IN 46410
> 219-981-9000

--
Vickie Galvin
Administrative Assistant
Butler School District 53
2801 York Road
Oak Brook, IL 60523
630-573-2887

EXHIBIT 37

Gmail   Rahul Julka <rjulkamd@gmail.com>

Reply to your email

1 message

ahanzlik@comcast.net <ahanzlik@comcast.net>   Thu, Mar 10, 2016 at 7:00 PM
To: Rahul Julka <rjulkamd@gmail.com>

Dear Dr. Julka: Please see my enclosed reply to your recent email. Thank you.

Julka parent letter.docx
19K

Dear Dr. Julka:

I write in response to your email communication sent on the evening of March 9, 2016. I will do my best to answer your questions while providing relative context. I have been on the Butler School District Board of Education for seven years, including six years as its President. During my time on the Board, I have become well versed on school operations, the rules and regulations schools must follow, Board policies and procedures, and the Board's obligations to its taxpayers, students, and staff. The Board takes our responsibilities and obligations to all constituents of the Butler School District community very seriously. Additionally, my professional background includes thirty-four years as a senior executive in banking.

In my seven years on this Board we have never encountered a situation similar to the matter in which we are currently faced regarding your family. Nor have we encountered a situation where a formal grievance was filed by a parent or where we did not utilize a current school district administrator to conduct an investigation into a school related issue. With that being said, it is important to me and the entire Board of Education that proper procedures are followed consistent with our policies and practices.

Normally when a grievance is filed pursuant to the Board's Uniform Grievance Procedure (No. 1400), an internal complaint manager, who is usually a school administrator, is the individual assigned to conduct the investigation. However, in light of the fact that Butler School District is a small school district with only a few administrators, all of whom had some involvement in the underlying internal investigation, and in light of your request that the investigation be conducted by a third party because your grievance involved specific complaints against the administrators who conducted the internal investigation, I believed it prudent to hire an outside party to conduct the investigation into your grievance. All of my actions and decisions in this matter have been completed consistent with and in compliance with the Board's policies and procedures.

My decision to retain Robbins Schwartz to conduct a resolution meeting and, if necessary, an investigation was done so for the reasons outlined above and after reviewing the Board's Uniform Grievance Procedure in great detail. I have had previous experience with this firm and know they are well versed in school law, very professional and thorough. Other choices available to me lacked the necessary experience. Please also be advised that the Board of Education has retained Robbins Schwartz and they are acting on the Board's behalf and at the Board's direction, not on behalf of or at the direction of the Superintendent or any school district administrator. Robbins Schwartz has been retained to ensure that the Board of Education has assurance that a fair process has been conducted. The Board has gone to great length and additional expense with the goal of accommodating your request for use of an external party.

Furthermore, I decided to utilize two attorneys from Robbins Schwartz, one to conduct the resolution session and one to conduct the investigation. While the grievance procedure allows the complaint investigator to conduct the resolution meeting, I believed it sensible to have two separate attorneys involved so the resolution process could be kept separate from the investigation process. I believed the knowledge of having an individual conduct the resolution session that would not later be involved in the investigation would assist the parties in having honest and fruitful discussions to facilitate resolution so they would not be concerned with any information they shared during the resolution meeting influencing the investigator. Additionally, while I have retained two attorneys to assist with the resolution and investigation, please be reminded that neither individual has the authority to make any decisions regarding the grievance. The resolution facilitator's role was solely to facilitate discussions in an attempt to reach a resolution; she did not make any determinations as to whether each party was correct or incorrect in their position or make any decisions. Furthermore, while the investigator is involved in gathering the facts to determine if the Administration's investigation and findings were correct, the Board of Education makes the sole decision as to whether the Administration's investigation, findings and sanctions should be upheld, modified or reversed.

I also want to address your concerns related to Dr. Wennstrom's discussions with the Board of Education related to the internal investigation previously conducted. Please be advised that it is a normal and expected practice for Dr. Wennstrom to keep the Board of Education apprised on matters when we have a potentially serious infraction of school policy, when the reputation of the District could be called into question or when the majority of the Superintendent's and Principal's job responsibilities have to be set aside for a period of time to address a significant issue within the school. Additionally, when communications are going to be issued to parents and the community regarding a significant situation such as this, it is normal and expected that the Board be involved in the process. In such situations the Superintendent keeps the Board apprised and the Board give the Superintendent direction. While the Board of Education has been apprised of the internal investigation steps to date, as would be typical in a case of such significance, a vote by the Board will not take place until the completion of the Uniform Grievance process. I can assure you that the Board will be fair minded and act with the best interests of the students of Butler School District 53 when reviewing the grievance investigation and making a final determination regarding findings and sanctions.

On the matter of a recorded phone conversation, I am aware of that component of the internal investigation. However, as you are aware, there are many pieces of evidence related to this matter. The phone conversation is but a very small part of the overall picture.

Concerning your last statement about an equitable, fair and impartial grievance process, the process that I have provided is more than equitable and I have gone further than the Board of Education policy requires to ensure such. Additionally, as indicated previously, the purpose of this grievance investigation completed by an outside party is to determine if the information the internal school investigation gathered and their findings related to such are accurate. Once the grievance investigation is completed and a report issued to the Board, the Board of Education has three options. The Board of Education can uphold the findings and sanctions previously determined by the Administration, the Board of Education can modify the findings and sanctions previously determined by the Administration, which may include decreasing, increasing or altering the sanctions, and the Board of Education can reverse the findings and sanctions previously determined by the Administration. The finality of the Board's decision is one of the reasons I asked that Ms. Roselli, resolution facilitator, stress to both the Administration and you, that resolution was the best option for reaching an alteration in the sanctions.

I understand this has been a very difficult situation for your family. However, I also need to point out that this is a very serious matter and one which could damage the positive and high performing reputation of the District. The Board takes academic dishonesty very seriously and will not allow any individuals to damage the reputation of the District which has been built over many decades. This investigation has been very expensive to taxpayers and has had a negative impact on academic deliverables for the last two months. The offer of a resolution meeting was an attempt by the Board of Education to put this event behind both you and the District. It is my understanding that you were given an extended amount of time to consider the terms of resolution, but that you have allowed that deadline to pass. In light of your letter and because I continue to hope that a resolution can reached and your family can move forward and the District can return to focusing on the serving the needs of our students and avoid the significant costs and resources the District has expended because of this matter, I will allow an extension of the resolution deadline until the end of day Saturday, March 12, 2016. This extension, however, is contingent on you withdrawing your pending FOIA request. If you are sincere about resolution, reduction of the previous sanctions issued and the interests of your children and the Butler School District community, you will resolve the situation and not proceed with the FOIA as it will cost the District more than $10,000 in administrative time and legal expenses in responding to such and takes away from the administration's ability to focus on serving the educational needs of the students of our district.

Additionally, please be advised that to date the District has spent close to $100,000 on this matter. The Board of Education has a fiscal responsibility to our taxpayers. Please be advised that the Board of Education may decide in the future to take action to recover such costs from you or take other action it determines to be appropriate.

Alan E. Hanzlik, President, Butler 53 Board of Education

EXHIBIT 38

Heidi Wennstrom <hwennstrom@butler53.com>

Resolution Meeting #1

5 messages

Heidi Wennstrom <hwennstrom@butler53.com> Mon, Mar 7, 2016 at 7:22 PM
To: alan hanzlik <ahanzlik@comcast.net>, Liz Chun [redacted], Caroline Roselli <croselli@robbins-schwartz.com>

Dear Alan and Liz,

We met for four hours today with the Julka family and Caroline Roselli. We reviewed the investigation facts with the family and discussed resolution options. The final negotiated terms include:

- From the date of February 8, 2016 to February 8, 2018, the Julka students will be banned from participation in all academic contests
- Waiver of claims
- Confidentiality clause with clause of non defamation of district and/or its employees
- Statement that they will not engage in future academic dishonesty (students or parents). A range of disciplinary actions that may occur should additional acts of academic dishonesty occur include possible suspension, permanent letter in student file, ban from any and all future D53 academic contests.
- At the time of matriculation to HS or transfer to another school, the letter will be removed for the student file if there have been no further incidents of academic dishonesty on the part of either students of parents.

[redacted] The family left without completing the agreement. They requested time to think about it until Wednesday. They were told that the greatest likelihood of achieving the above reduction in sanctions is at this resolution meeting. They were told that the Board is resolute in protecting the academic integrity of the district. Our lawyer shared that it will be less than likely to achieve a better outcome following a full scale investigation.

The Julka family will consider the offer until 9:00 a.m. on Wednesday and then notify us of their decision. [redacted]

[redacted]

Heidi

--

Heidi Wennstrom, Ph.D, Ed.D
Superintendent

Butler School District 53
2801 York Road
Oak Brook, Illinois 60523

(630) 573-2887
(630) 573-5374 (fax)

EXHIBIT 39

Superintendent

Butler School District 53
2801 York Road
Oak Brook, Illinois 60523

(630) 573-2887
(630) 573-5374 (fax)

Heidi Wennstrom <hwennstrom@butler53.com> Tue, Jan 26, 2016 at 11:58 AM
To: Caroline Roselli <croselli@robbins-schwartz.com>

The second document is the GEO Bee questions and directions.

---------- Forwarded message ----------
From: **Jennifer Traub** <jtraub@butler53.com>
Date: Sat, Jan 16, 2016 at 11:46 AM
Subject: Geography Bee
[Quoted text hidden]

--

Heidi Wennstrom, Ph.D, Ed.D
Superintendent

Butler School District 53
2801 York Road
Oak Brook, Illinois 60523

(630) 573-2887
(630) 573-5374 (fax)

---

2 attachments

SIGN IN OR REGISTER!

Screen Shot 2016-01-16 at 11.41.40 AM.png
536K

geobee-2015-2016.pdf
19915K

Heidi Wennstrom <hwennstrom@butler53.com> Tue, Jan 26, 2016 at 12:37 PM
To: Caroline Roselli <croselli@robbins-schwartz.com>

The second document is the GEO Bee questions and directions.

---------- Forwarded message ----------
From: **Jennifer Traub** <jtraub@butler53.com>
Date: Sat, Jan 16, 2016 at 11:46 AM
Subject: Geography Bee
To: Heidi Wennstrom <hwennstrom@butler53.com>

EXHIBIT 40

[redacted]

Subject: Fwd: [redacted]

Libby: [redacted]

----- Forwarded Message -----
From: "Libby Massey" <lmassey@robbins-schwartz.com>
To: ahanzlik@comcast.net, "Heidi Wennstrom" <hwennstrom@butler53.com>
Cc: "Caroline Roselli" <croselli@robbins-schwartz.com>
Sent: Thursday, March 24, 2016 6:35:03 PM
Subject: [redacted]

Hi Alan and Heidi,

[redacted]

Please let me know what you think of this idea. Thanks!

Libby N. Massey
Attorney
Robbins Schwartz
55 W. Monroe St. Suite 800
Chicago, Illinois 60603-5144
p: 312.332.7760 f: 312.332.7768
lmassey@robbins-schwartz.com<mailto:lmassey@robbins-schwartz.com>

[Robbins Schwartz]

This message is confidential. This message may also be privileged or protected by work product immunity or other laws and regulations. If you have received it by mistake, please re-send this communication to the sender and delete it from your system without copying it or disclosing its contents to anyone.

[redacted]

Libby Massey

From: Heidi Wennstrom <hwennstrom@butler53.com>
Sent: Thursday, March 24, 2016 11:17 AM
To: Libby Massey; Sandi Moore
Cc: Vickie Galvin; Kelly Voliva; Jacqueline Cottle

EXHIBIT 41

Kelly Voliva <kvoliva@butler53.com>

Recording of phone conversation

1 message

Heidi Wennstrom <hwennstrom@butler53.com> Tue, Jan 19, 2016 at 3:21 PM
To: Heidi Wennstrom <hwennstrom@butler53.com>, Kelly Voliva <kvoliva@butler53.com>

Saturday morning phone call between Badlani and Julka

B: I don't have any questions. My kids study hard
How do you know if these are the questions.
You said he couldn't be runner up without the questions.
This year the ones you read to me I just want to know if these questions were real. If they are real the contest will be unfair. You need to tell the principal.

J: Do you want the questions?
B: No. Last year I didn't believe you when you said you had the actual questions. You are scaring me if you have the questions.
B: You told me Shiv has it. You should withdraw.
J: I told Shelly we should cancel.

B: We did like 25000 questions. We have been making questions since my children were very young.
J: These GEO Bee tests have approximately 200-300 questions

J: I don't know what Shelly has. I actually don't even care.

B: I don't know if the questions were given to someone else. It is unfair if Shiv has the questions.

B: My goal is for my boys to be the National Geo Bee not to get the questions in advance

[In first call. Admitted to Mrs. B. that Dr. Jain had the log in to the questions.]

B: My child has given up math for Geo to get to the goal of being national geography champion.

If you go to the contests you will see how much Geography means to the children.

J: I offered to share the test scores with you.
B: Alright then show it to me. If it is real then I will ...

J: Then let everyone have it. Everyone studied from the same study materials.

B: That would be unfair if everyone had the questions in advance. My sons have known every country and capital in the world since they were two.

J: Is it fair that you have Lareau tutoring your child?
B: She is teaching him not giving him answers.

B: Komol you are home all day long. My kids would be doing great

J: You have the old Latin math. Its ok to have old Latin.

B. You are telling me that you have the actual tests for Geo bee. I will show it to the principal. Why don't you print it and show it to the principal.

B: I know your boys will not be participating but Shiv will still be participating.

J: These are just materials to study.

J: I even offered to share the Geo Bee test wish you. There are 80-90 pages.
Then why don't you share it with me.

B: Ravi does not want to even see it. Do not share it with us.

B: School level test is made by National Geo Bee.

J: I will go to the principals office. I jailbroke the questions Let's tell the principal.

J: Ok. Shiv didn't even make the first round.

B: I think it is wrong for someone to have the questions in advance. This is the same thing that you have with Latin. Lareau has tutored from past questions. This is legal.

B: It is illegal to jailbroke a website

B. Tried to convince Komol to turn in the questions to the principal.

J: I guarantee you can take the Geo Bee outside of a school.

B: I know this for sure that this cannot happen.

B: My kids have made it to state 3 x.

B: I know how much my boys put into this preparations 2-3 hours per day.
How is it fair that some children have the questions in advance.

J: Mrs. Julka pushing for Latin tests.
My son made it without ever doing a Latin math test to score.

B: I think you should print it and give it to the Principal. The contests need to be fair.

J: The problem is the number of times Lareau has tutored the children. They have you, you have time to tutor them.

J: Why are we putting our kids in these types of environments?

B: What does tutoring have to do with Geo Bee?
Getting your kids tutored is not illegal. Getting the actual questions is illegal.

J: I am going to given anyone who wants the question to you.

B: Even if your child has not seen the paper, they may have access to the information from you.

J: I could have told my kids.

HW I think Komol's kids know that she had the tests.

J: I'm not that kind of a friend. Why don't you practice these old questions?
You have not shared any information with me. I don't want the test if it is not fair.

B. Adi number two in Kumon in the country. Did not ever have tutoring in Geometry.

B. Father in background–She better not print anything for us. You better tell the principal.

--

Heidi Wennstrom, Ph.D, Ed.D
Superintendent

Butler School District 53
2801 York Road
Oak Brook, Illinois 60523

(630) 573-2887
(630) 573-5374 (fax)

EXHIBIT 42

Oak Brook Police Department Crime Report

Case No. **OP16008600**
Report No. **OP16008600.1**
Report Date: **5/2/2016**

Oak Brook Police Department
1200 Oak Brook Rd
Oak Brook, IL 60523
630 368-8701

1

Subject:	**2835 - EAVESDROPPING**				
Case Report Status	**A - Approved**	Date Entered	**5/2/2016 9:54:38 PM**	Reporting Officer	
		Entered By	**NB84 - Baca, Nicolas**		**NB84 - Baca, Nicolas**
Occurred On	**1/16/2016 7:53:00 AM**	Date Verified			
(and Between)		Verified By			
		Date Approved	**5/4/2016 4:42:45 AM**		
Location	**717 ST JOSEPHS CT OAK BROOK IL 60523**	Approved By	**DR50 - Ramirez, Danny**	Assisted By	
Jurisdiction	**OB - Oakbrook PD**	Connecting Cases			
Grid	**OB01 - ZONE 1**	Disposition	**Active**		
Sector	**112V - 112V**	Clearance Reason			
Map		Date of Clearance			
Census/Geo		Reporting Agency	**Oak Brook Police Department**		
Call Source		Division			
		Notified			
Vehicle Activity		Means			
Vehicle Traveling		Other Means			
Cross Street		Motive			
		Other Motives			

Report Narrative

***1 Count Eavesdropping
***Badlani, Ravi (10/11/67)

On 05/02/2016 at 1854 hours, I responded to the station for a report of eavesdropping. I met with the victim, Komar Julka, and her husband, Rahul Julka.

Komar advised she has children who attend Brook Forest School. Her children were involved in a program known as, The National Geo Bee. Komar earlier in the year was able to find what she believed to be a study guide for the program. After obtaining the study guide she attempted to share the guide with other parents so their children could use it to study. Komar advised she eventually showed, Vandana Badlani the study guide. Vandana was not welcome to the study guide and became very upset. On 01/16/16 at 0753 hours, Komar contacted Vandana reference the study guide and to discuss it further. Komar (630-806-6112) engaged in conversation with Vandana (630-512-1814) for approximately thirty-one (31) minutes, . Komar advised during the phone call, she was told by Vandana the study guide contained questions on the national test, and it was unfair for her to have it, so she was going to report her. Komar stated she did not know the study guide contained the questions for the actual test and believed it was just a study guide.

On 02/08/16 Komar advised she and Rahul received a letter from the school superintendent, Heidi Wennstrom, advising them their children have been disqualified from participating in the National Geo Bee. Komar advised her children have been disqualified from all future programs as well. Komar and Rahul filed a grievance to the school.

On 03/07/16 Komar and Rahul met with, Wennstrom and the school's lawyer, who acted as a mediator between both parties. During the meeting, they discussed the disqualification of their children due to the study guide. Komar advised Wennstrom said she heard a phone conversation between Komar and Vandana discussing the study guide. Komar questioned what phone conversation, and asked if she could hear the conversation. Wennstrom advised she did not have it. Komar further asked who had it and was advised Vandana provided it. Komar stated she was told the conversation from 01/16/16 was apparently recorded by Vandana's husband, Ravi Badlani.

Komar and Rahul filed a, Freedom of Information Act (FOIA) to the school and obtained several documents. Among the documents, Komar and Rahul found what appeared to be a transcript of a recording to a phone conversation. The transcript is believed to be of the conversation Komar and Vandana had back on 01/16/16, before they received the letter of disqualification. See attached.

On 03/31/16 Komar received an email from the mediator, which in summary stated, in regards to the decision she would not take into consideration any notes, emails, statements, related to the audio recording of the telephone conversation between Komar and Vandana. The mediator stated she has not heard nor will hear the conversation or factor it into her decision. See attached.

Komar stated any conversation she had with Vandana, she was never informed she was being recorded, and the recording was done without her permission. Komar believes Vandana told Ravi to record the conversation so Vandana could take it to the school's superintendent.

I left Komar with the report number and my contact information. Komar stated she wished to sign complaints.

I returned to patrol.

Oak Brook Police Department Crime Report

Case No. **OP16008600**
Report No. **OP16008600.1**
Report Date: **5/2/2016**

Oak Brook Police Department
1200 Oak Brook Rd
Oak Brook, IL 60523
630 368-8701

Offense Detail: 2835 - EAVESDROPPING

Offense Description	2835 - EAVESDROPPING				
IBR Code	90Z - All Other Offenses	Location	290 - RESIDENCE PRIVATE		
IBR Group	B	Offense Completed?	Yes	No. Prem. Entered	
Crime Against		Offense Status	02 - Pending	Entry Method	
Using		Hate/Bias	88 - None (No Bias)	Type Security	
		Domestic Violence	No	Tools Used	
Criminal Activity					
Weapons/Force					

Suspect S1: Badlani, Ravi

Suspect Number	S1	DOB	[redacted]	Place of Birth	
Name	Badlani, Ravi	Age	48	SSN	
AKA		Sex	M - Male	DLN	[redacted]
Alert(s)		Race	U - Unknown	DLN State	[redacted]
		Ethnicity	U - Unknown	DLN Country	
Address	[redacted]	Ht.	[redacted]	Occupation/Grade	
CSZ	[redacted]	Wt.	[redacted]	Employer/School	
		Eye Color	[redacted]	Employer Address	
Home Phone		Hair Color	[redacted]	Employer CSZ	
Work Phone		Hair Style		Res. County	
Email Address		Hair Length		Res. Country	
		Facial Hair		Resident Status	R - Resident
		Complexion			
		Build			
		Teeth			

Scars/Marks/Tattoos
Suspect MO
Other MO
Attire
Habitual Offender Status
Suspect Notes

Victim V1: Julka, Komal R

Victim Code	V1	Victim Of	2835 - EAVESDROPPING		
Victim Type	I - Individual				
Name	Julka, Komal R	DOB	6/15/1975	Place of Birth	
AKA		Age	40	SSN	
Alert(s)		Sex	F - Female	DLN	J420-5167-5770
		Race	W - White	DLN State	IL - Illinois
Address	717 St Josephs DR	Ethnicity	N - Not of Hispanic Origin	DLN Country	
CSZ	Oak Brook, IL 60523	Ht.	5' 1"	Occupation/Grade	
		Wt.	100	Employer/School	
Home Phone	630 806-6112	Eye Color	BRO - Brown	Employer Address	
Work Phone		Hair Color	BRO - Brown	Employer CSZ	
Email Address		Facial Hair		Res. County	
		Complexion		Res. Country	
Attire				Resident Status	R - Resident
Injury				Testify	Yes
Circumstances					

Law Enforcement Officer Killed or Assaulted Information	
Type	
Assignment	
Activity	
Other ORI	

Justifiable Homicide Circumstances	

Victim Offender Relationships

Offender	Relationship

Victim Notes

Oak Brook Police Department Crime Report

Case No. **OP16008600**
Report No. **OP16008600.1**
Report Date: **5/2/2016**

Oak Brook Police Department
1200 Oak Brook Rd
Oak Brook, IL 60523
630 368-8701

Other Entity: O1 -- Julka, Rahul N

Entity Code	O1
Entity Type	I - Otherwise Involved
Name	Julka, Rahul N
AKA	
Alert(s)	
Address	717 St Jospehs CT
CSZ	Oak Brook, IL 60523
Home Phone	630 306-6460
Work Phone	
Email Address	
Attire	
Entity Notes	
DOB	7/14/1975
Age	40
Sex	M - Male
Race	W - White
Ethnicity	N - Not of Hispanic Origin
Ht.	5' 10"
Wt.	210
Eye Color	BRO - Brown
Hair Color	BLK - Black
Facial Hair	
Complexion	
Place of Birth	
SSN	
DLN	J420-7347-5200
DLN State	IL - Illinois
DLN Country	
Occupation/Grade	
Employer/School	
Employer Address	
Employer CSZ	
Res. County	DuPage
Res. Country	USA - United States of America
Resident Status	R - Resident

Other Entity: O2 -- Badlani, Vandana K

Entity Code	O2
Entity Type	I - Otherwise Involved
Name	Badlani, Vandana K
AKA	
Alert(s)	
Address	[redacted]
CSZ	[redacted]
Home Phone	[redacted]
Work Phone	
Email Address	
Attire	
Entity Notes	
DOB	[redacted]
Age	44
Sex	F - Female
Race	U - Unknown
Ethnicity	U - Unknown
Ht.	[redacted]
Wt.	[redacted]
Eye Color	[redacted]
Hair Color	[redacted]
Facial Hair	
Complexion	
Place of Birth	
SSN	
DLN	[redacted]
DLN State	[redacted]
DLN Country	
Occupation/Grade	
Employer/School	
Employer Address	
Employer CSZ	
Res. County	DuPage
Res. Country	USA - United States of America
Resident Status	R - Resident

Other Entity: O3 -- Wennstrom, Heidi

Entity Code	O3
Entity Type	I - Otherwise Involved
Name	Wennstrom, Heidi
AKA	
Alert(s)	
Address	
CSZ	
Home Phone	
Work Phone	630 573-2887
Email Address	
Attire	
Entity Notes	
DOB	
Age	
Sex	F - Female
Race	U - Unknown
Ethnicity	U - Unknown
Ht.	
Wt.	
Eye Color	
Hair Color	
Facial Hair	
Complexion	
Place of Birth	
SSN	
DLN	
DLN State	
DLN Country	
Occupation/Grade	Superintendant
Employer/School	Butler School District
Employer Address	2801 York RD
Employer CSZ	Oak Brook, IL 60523
Res. County	
Res. Country	
Resident Status	U - Unknown

Oak Brook Police Department Follow-Up Report

Case No. **OP16008600**
Report No. **OP16008600.2**
Report Date: **5/19/2016**

Oak Brook Police Department
1200 Oak Brook Rd
Oak Brook, IL 60523
630 368-8701

1

Subject: **2835 - EAVESDROPPING**

Case Report Status	A - Approved	Date Entered	5/19/2016 3:04:27 PM	Reporting Officer	NB84 - Baca, Nicolas
		Entered By	MK56 - Kozlowski, Mark		
Occurred On (and Between)	1/16/2016 7:53:00 AM	Date Verified			
		Verified By			
		Date Approved	5/20/2016 3:46:04 PM		
Location	717 ST JOSEPHS CT OAK BROOK IL 60523	Approved By	BS62 - Strockis, Brian	Assisted By	
Jurisdiction	OB - Oakbrook PD	Connecting Cases			
Grid	OB01 - ZONE 1	Disposition	Active		
Sector	112V - 112V	Clearance Reason			
Map		Date of Clearance			
Census/Geo		Reporting Agency	Oak Brook Police Department		
Call Source		Division			
		Notified			
Vehicle Activity		Means			
Vehicle Traveling		Other Means			
Cross Street		Motive			
		Other Motives			

Report Narrative

On 5/5/16 I spoke to District 53 Superintendent Dr. Heidi Wennstrom. I advised her of the reported incident and asked if she could give me some background on the incident since I had a copy of an email that appeared to have notes from a phone conversation between Badlani and Julka. Dr. Wennstrom advised there were several issues that were active in the school concerning the Julka family. One of the issues was the alleged "Academic Misconduct" of the Julkas in acquiring material for a National Geography Contest. She added that the school district conducted their own investigation into the incident and found the statements made by the Julka family to be misleading, and contrary to information learned in the investigation. Dr. Wennstrom advised as part of the investigation she had interviews with the parents. During an interview with the Dr. Badlani she was advised by Badlani that she could prove she was not telling lies. Badlani played part of an audio recording of what sounded like a phone conversation between Badlani and Komal Julka. The portion of the conversation with Badlani speaking was clear, but the portion where Julka was speaking sounded distant and inaudible at times. Dr. Wennstrom attempted to take notes of what she heard, but could not keep up with the conversation. She added that she may have switched who said certain things, and definitely did not get all of what was said on the recording. She started paraphrasing after a short while and put things into her own words from what she recalled from the conversation.

On 5/6/16 I spoke with Vandana Badlani. I advised her that a report was filed by the Julka family alleging that she illegally recorded a conversation with Julka on the morning of 1/16/15. I asked Badlani to tell me her side of the story regarding a possible illegally recorded conversation. Badlani relayed the following in summary and not verbatim. On Friday 1/15/16 she received a call from Komal Julka who was trying to set up a study group for the National Geo Bee. Julka told her she had a list of study questions that she purchased off the website and offered them to Badlani. Julka allegedly wanted to trade for the Math competition questions. She was told that another family broke into the Geo Bee website, using a neighbor's IP address, in order to get the questions. Badlani was concerned about the questions and asked Julka to read her a few of the questions. She had never heard of study questions being available in the past. Julka read 3 questions and they alarmed Badlani, who told Julka that they were the actual competition questions. She told Julka to contact the school as well as the Geo Bee organization and tell them about having the questions. Badlani hung up the phone and immediately emailed the local and national Geo Bee organizations, alerting them to the access to the questions. Badlani was not sure how to contact the school administration over the weekend, so she contacted the PTO President, who in turn notified Dr. Wennstrom. Badlani also sent a text message to Julka and another family stating that they should not be in possession of the questions and should withdraw from the competition. I also had Badlani look over the notes taken by Dr. Wennstrom. She stated that small parts were said by her, but it was not in her words and not in the order of the conversation. She said this could not be an accurate "Transcript" of the conversation.

On Saturday morning, 1/17/16 Julka called Badlani, but Badlani didn't answer. Badlani called her back, and at the suggestion of Badlani's Husband, he used a cell phone to record his wife while talking to Julka. He was approximately 5 or 6 feet away from his wife while she spoke to Julka. His only intention was to record his wife, so that if it was later stated that his wife made certain comments to Julka they would have proof of exactly what his wife said. Dr. Badlani stated there was never an intent to record Julka in the conversation, and it was not know until after the conversation concluded that Julka's voice was partially audible on the recording. Badlani advised that Julka's story about the questions changed over the remainder of the weekend and alleged that Julka was going o get her kids disqualified from the competition as well. Badlani stated that the recording does not exist any more.

On 5/10/16 I was contacted by the Law Firm of Dolci & Weiland, and spoke to Pat Weiland. He advised he was retained by the Badlani family and emailed me a copy of the invocation of the Badlani's 5th and 6th Amendment rights. He asked that any further conversation go through him or his law firm. I have attached a copy of the letter to this report.

On 5/11/16 Detective Foltyniewicz and I spoke to Komal Julka concerning the report. Komal relayed the following information in summary and not verbatim. Komal advised there was a mass email sent out to parents concerning the Geo Bee, but she

Oak Brook Police Department Follow-Up Report

Case No. **OP16008600**
Report No. **OP16008600.2**
Report Date: **5/19/2016**

Oak Brook Police Department
1200 Oak Brook Rd
Oak Brook, IL 60523
630 368-8701

was not included on the email list. She contacted another parent and requested a copy of the email. Then on 1/13/16 Komal's brother went to the Geo Bee website looking for study material. She stated she gave her brother her credit card to buy study materials. He went to the "Home School" section and registered as a Home School since he was going to help the kids study at home. He purchased study questions from the website and a world atlas type book on Amazon or E-Bay. Then on Friday evening (1/15/16) she contacted Badlani and offered to share the material with her and others. Badlani became upset and started accusing her of cheating, saying that she had the actual test questions in her possession, and that she should pull her kids out of the competition. Komal and her husband agreed to withdraw from the Geo Bee competition because they didn't want it to appear that there was intent to cheat or deceive any one. Komal wondered how Badlani knew they were the "Real" questions. Badlani called her the next day to talk about the situation. This is when she believes Badlani intentionally recorded her. By Tuesday morning at school everyone at school knew about the conversation and the possession of the possible "actual" questions.

Time passed and the Julka family was investigated by the school district for Academic Dishonesty. The kids were disqualified from the Geo Bee and banned from and further competitions while enrolled at schools within the district. The Julkas filed a grievance with the school district and filed a Freedom of Information Act (F.O.I.A) request for all information gained in the investigation. It was with this request that Julka discovered what she believed to be a "Transcript" of the phone conversation. In actuality it was just typed notes of a small portion of an audio clip that was played by Badlani.

I contacted the DuPage County State's Attorney's Office and spoke with ASA Kristin Johnston regarding this case. At the conclusion of the conversation I was advised that without a copy of the alleged recording, and an accurate understanding of what was, and was not audible on the recording, there was not enough proof of the criminal act of Eavesdropping. In addition, there was no proof as to the intent of the recording being clandestine or covert in nature.

On 5/18/16 I spoke to Rahul Julka, who is Komal's Husband. Rahul advised that he and his wife feel like they have been treated unfairly by the school district and their kids have been punished too severely. It has been affecting the academic performance of their kids and has unfairly "Black Balled" them for the rest of their time within the district. The kids have been paying the penalty for an honest mistake. I advised him of the information I learned throughout my investigation. I told him there was a lack of evidence to move forward with a criminal charge for Eavesdropping. I added that he may want to speak to an attorney about other options he and his family may have in this matter. I advised him I would be closing the case without charges being filed.

Offense Detail: 2835 - EAVESDROPPING

Offense Description	2835 - EAVESDROPPING				
IBR Code	90Z - All Other Offenses	Location	290 - RESIDENCE PRIVATE		
IBR Group	B	Offense Completed?	Yes	No. Prem. Entered	
Crime Against		Offense Status	02 - Pending	Entry Method	
Using		Hate/Bias	88 - None (No Bias)	Type Security	
		Domestic Violence	No	Tools Used	
Criminal Activity					
Weapons/Force					

EXHIBIT 43

Gmail

Rahul Julka <rjulkamd@gmail.com>

Re: Reply to your email

Rahul Julka <rjulkamd@gmail.com> Sat, Mar 12, 2016 at 11:09 PM
To: alan hanzlik <ahanzlik@comcast.net>
Bcc: christopher.stull@comcast.net

Dear Mr. Hanzlik,

thank you for your email. After reading through it, and deliberating with my wife, we can not accept that our children are being punished and sanctioned when they have done nothing wrong. We have therefore decided to hire attorney Christopher J. Stull to represent our children in this matter.

Respectfully,

Rahul N. Julka

Rahul N. Julka, M.D.
Gastroenterology and Transplant Hepatology
Dalal Medical Corporation
5825 Broadway Suite B
Merrillville, IN 46410
219-981-9000

On Thu, Mar 10, 2016 at 7:00 PM, <ahanzlik@comcast.net> wrote:

> Dear Dr. Julka: Please see my enclosed reply to your recent email. Thank you.

EXHIBIT 44

Gmail

Rahul Julka <rjulkamd@gmail.com>

Re: Reply to your email

1 message

ahanzlik@comcast.net <ahanzlik@comcast.net> Sun, Mar 13, 2016 at 2:18 PM
To: Rahul Julka <rjulkamd@gmail.com>

Thank you for your reply. I will pass the information along to the Board and administration.

EXHIBIT 45

Gmail

Rahul Julka <rjulkamd@gmail.com>

Uniform Grievance Determination

1 message

Vickie Galvin <vgalvin@butler53.com> Fri, Apr 15, 2016 at 3:56 PM
To: kjulka57@gmail.com, Rahul Julka <rjulkamd@gmail.com>

Dear Dr. & Mrs. Julka,

On behalf of Mr. Alan Hanzlik I am forwarding you the determination by the Board Education related to the Uniform Grievance you filed on February 8, 2016.

Sincerely,
Vickie Galvin

--
Vickie Galvin
Administrative Assistant
Butler School District 53
2801 York Road
Oak Brook, IL 60523
630-573-2887

3473_001.pdf
524K

Butler 53 School District
2801 York Road
Oak Brook, Illinois 60523-2399

Board of Education
and Administrative Center
2801 York Road
Telephone: 630-573-2887
Fax: 630-573-5374

Butler Junior High School
2801 York Road
Telephone: 630-573-2760
Fax: 630-573-3374

Brook Forest School
60 Regent Drive
Telephone: 630-328-6888
Fax: 630-325-8452

www.butler53.com

April 15, 2016

Dear Dr. Julka and Mrs. Julka,

Pursuant to the Board of Education's Uniform Grievance Procedure and Policy 1400, I write to inform you of the determination of the Board of Education related to the Grievance Complaint you filed on February 16, 2016. After a thorough review and consideration of the investigation report, the Board unanimously affirmed the findings and sanctions previously issued by Dr. Heidi Wennstrom on February 8, 2016, as well as the findings reached by the investigator.

As you are aware on January 15, 2016, Dr. Heidi Wennstrom, Superintendent of Butler School District 53 ("the District"), received a complaint alleging that certain Butler parents engaged in academic dishonesty and fraud in connection with the District's upcoming National Geography Bee ("GeoBee"). Based on such, Dr. Wennstrom commenced a thorough internal investigation into the allegations. On February 8 2016, Dr. Wennstrom concluded her investigation and issued via letter the following sanctions against your family:

1. Your children are no longer permitted to participate in any Butler 53 School District academic contests and/or competitions, team or individual, while he is a student within the District. Your children are allowed to participate in after school clubs, activities and extracurricular activities that do not have an academic contest and/or competition component.

2. You are not permitted to serve in any capacity as a parent volunteer in any school related contests and/or competitions.

On February 16, 2016, you submitted a three page grievance letter ("Grievance Complaint") to my attention, as Board President of the Butler Board of Education, appealing Dr. Wennstrom's sanctions against your family. The Grievance Complaint outlined the following assertions:

- The Julkas felt strongly that the investigation surrounding the events leading to the sanctions was inaccurate, misrepresentative, inconsistent, and handled poorly and unprofessionally.

- The findings of the investigation concluded that the Julkas maliciously intended to cheat on the examination by purchasing the exam questions in a deceitful manner. The Julkas refute this claim because the exam questions were purchased unknowingly by Komal's brother, Trushar Patel, whom the Julkas had entrusted with helping their children prepare for the National Geographic Bee exam. Trushar had signed up for a home-schooling account, thinking that this was effectively what he was doing for the Julka children, in the hopes of obtaining study material and practice questions.

- At no time, did Trushar Patel or the Julkas expect or understand that signing up for a home-schooling account would potentially grant access to the actual exam to be used in 2016.

- The address used for the home school was in Roselle, IL, which is Trushar's home address. Despite explaining this, the school investigators accused Komal of making up her brother, and making up his home address. If we were trying to be deceitful in any way, we would obviously not have used our own personal credit card to pay for registration.

- The Julkas' decision to withdraw their children from the Geography Bee had nothing to do with the influence or convincing of other parents. The Julkas decided to withdraw their children based on the possibility that they may have had exam questions.

- On January 19, 2016, Komal approached and notified Principal Voliva first-thing in the morning that she may have accidentally downloaded material from the National Geographic Bee website that potentially could represent the upcoming exam questions and that they had pulled their children out of the contest. Komal's meeting with Mrs. Voliva was NOT to complain about poor parent behavior.

- At another meeting the same day, Komal was accused of being a cheater and was summarily dressed down and insulted by both Voliva and Wennstrom in front of another parent. Mrs. Voliva and Dr. Wennstrom "apparently could not follow the events detailed by Komal," and they blamed Komal for being inaccurate, inconsistent, and deceitful. The other parent (Dr. Badlani) lied to Mrs. Voliva and Dr. Wennstrom.

- On February 2, 2016, Mrs. Voliva pulled Rohan Julka out of an exam to question him in her office. [...] Rohan had never seen nor heard a single question from the National Geographic material; the only discussion they had with him about the contest was that he was not going to participate in it because Komal and Rahul may have seen the questions already. [Rohan] stated he felt extremely uncomfortable and that Mrs. Voliva was speaking meanly to him, and he didn't understand what he had done wrong. He also told the Julkas that he felt as if Mrs. Voliva was accusing him of cheating in the upcoming WordMasters competition [...].

- Lastly, but no less important, is that at no point whatsoever did either of the Julka children engage in "academic dishonesty and cheating" as accused by the school. The Julkas voluntarily withdrew their children from the exam they in fact never saw nor heard a single exam question. To sanction the Julka children from participating in any school contest for their remaining time in District 53 is unfair and unjust.

Upon receipt of your Grievance Complaint, I sought out a Complaint Investigator who had no knowledge or involvement in Dr. Wennstrom's internal investigation to conduct an independent review and investigation into your Grievance Complaint. In light of the involvement of all of the District's administrators in some component of the internal investigation and because your Grievance Complaint specifically complained about the Superintendent, I believed it prudent and fair to bring in an investigator from an entity outside of the District. Based on such I appointed Libby Massey, an attorney at Robbins Schwartz Nicholas Lifton & Taylor to investigate the Grievance Complaint. Ms. Massey conducted a prompt, equitable and thorough investigation into your Grievance Complaint. She concluded her investigation on April 7, 2016 and sent her investigation report directly to the Board of Education on April 9, 2016. On April 11, 2016 the Board of Education considered and discussed the investigation report during its scheduled board meeting. At that meeting, the Board of Education affirmed the findings and sanctions previously issued by Dr. Heidi Wennstrom on February 8, 2016, as well as the findings reached by the investigator.

Ms. Massey's investigation included a review of relevant documents submitted by Mrs. Julka, Dr. Badlani, as well as documents submitted by the Superintendent related to the District's internal investigation. In addition to the documents reviewed, Ms. Massey's investigation also included detailed interviews of 9 individuals relevant to the Grievance Complaint, as well as a review of written statements submitted by your children's attorney. Based on the investigatory interviews and document review, Ms. Massey made the following factual findings, which are consistent with those previously reached by Dr. Wennstrom:

1) On January 13, 2016, Mrs. Julka created a fraudulent homeschool account with the National Geographic Bee with the intent of obtaining the actual 2015-2016 GeoBee contest questions to prepare her two sons for the January 19, 2016 contest at Brook Forest.

2) On January 15, 2016, Mrs. Julka paid for and obtained the 2015-2016 GeoBee contest questions.

3) On January 15, 2016, Mrs. Julka knew the GeoBee material she obtained was the actual 2015-2016 GeoBee contest questions.

4) Mrs. Julka fraudulently created the *geowizz57* account to work the system and gain access to the GeoBee questions.

5) Prior to the January 19, 2016 GeoBee contest, Mrs. Julka provided Dr. Jain with the account and password information so Dr. Jain could also log in and obtain the 2015-2016 GeoBee contest questions.

6) Mrs. Julka and Dr. Badlani spoke on the phone on the evening of January 15, 2016. During the telephone conversation, Mrs. Julka told Dr. Badlani that she had "jailbroke" the GeoBee website and had obtained the 2015-2016 GeoBee contest questions.

7) During the January 15, 2016 telephone conversation between Mrs. Julka and Dr. Badlani, Mrs. Julka read Dr. Badlani some of the GeoBee instructions and at least three of the GeoBee questions to prove to Dr. Badlani that she had the contest questions. Dr. Badlani told Mrs. Julka at that time that the instructions and questions provided by Mrs. Julka sounded like actual GeoBee instructions and questions.

8) On January 15 and 16, 2016, Dr. Badlani told Mrs. Julka that she should withdraw her sons from the upcoming GeoBee contest.

9) On the evening of January 15, 2016, Dr. Julka pulled the Julka children out of the upcoming GeoBee contest. Dr. Julka did not state a reason for pulling the children out of the contest.

10) Dr. Julka did not state that a family wedding was the reason he pulled his children from the contest.

11) On January 16, 2016, Mrs. Julka emailed Ms. Owen, unrelated to the GeoBee, to let her know that Rohan would be on vacation for a family wedding from January 22-27, 2016.

12) On January 16, 2016, Dr. Badlani reported Mrs. Julka's academic dishonesty to Dr. Wennstrom. Dr. Badlani also reported to Dr. Wennstrom the three GeoBee questions that Mrs. Julka had read to her the night before.

13) Dr. Wennstrom cross-referenced the three questions from Dr. Badlani and confirmed two were actual 2015-2016 GeoBee contest questions.

14) The Brook Forest GeoBee commenced as usual on January 19, 2016.

15) Rohan and Aarav did not see the 2015-2016 GeoBee contest questions.

16) Rohan and Aarav did not participate in the 2015-2016 Brook Forest GeoBee Competition.

17) Dr. Jain's son did see the 2015-2016 GeoBee contest questions because of the false homeschool account information that Mrs. Julka provided Dr. Jain.

18) Dr. Jain's son did participate in the 2015-2016 GeoBee contest.

19) Dr. Badlani never had any access to the 2015-2016 GeoBee contest questions.

20) The Badlani children never had any access to the 2015-2016 GeoBee contest questions.

21) The Badlani children did participate in the 2015-2016 GeoBee contest.

22) On January 19, 2016, Mrs. Julka approached Mrs. Voliva at Brook Forest and stated she would like to talk with her about something and would like to get something off of her chest. Mrs. Voliva told Mrs. Julka to come back in about an hour.

23) On the morning of January 19, 2016, Mrs. Julka met with Mrs. Voliva and Dr. Wennstrom in Mrs. Voliva's office. At this meeting, Mrs. Julka stated she did not know how she did it, but that she accidentally gained access to the 2015-2016 GeoBee contest questions. Mrs. Julka repeatedly told Mrs. Voliva and Dr. Wennstrom that it was an accident.

24) Also at this meeting, Mrs. Julka tried more than once to implicate Dr. Badlani and state that Dr. Badlani also had access to the GeoBee questions.

25) At this meeting, Mrs. Julka stated negativity about the District creating a culture of competitiveness and that it put too much pressure on students and parents.

26) At this meeting, Mrs. Julka shifted her story and said that she had obtained the contest materials by creating and signing up as a homeschool. She still said at this time that it was an accident that she obtained the actual contest questions through the homeschool.

27) At this meeting, Mrs. Julka voluntarily showed Mrs. Voliva and Dr. Wennstrom, on Mrs. Voliva's computer, a Gmail account Mrs. Julka had created called *geowizz57@gmail.com*. Mrs. Julka voluntarily went through the emails in the account with Mrs. Voliva and Dr. Wennstrom and voluntarily allowed Mrs. Voliva to print the emails and attachments.

28) After the meeting, Dr. Wennstrom and Mrs. Voliva confirmed with GeoBee that there were only two GeoBee homeschools in Illinois, one of which Dr. Julka created under the name "T. Patel" called "Rosselle Homeschoolers," and under the email *geowizz57@gmail.com*. Mrs. Julka paid for the GeoBee materials with her own credit card.

29) Dr. Wennstrom and Mrs. Voliva also confirmed with GeoBee that no other homeschool accounts existed for any of the other implicated families, including Dr. Badlani's.

30) Around lunchtime on January 19, 2016, Mrs. Julka came back to Brook Forest to meet with Mrs. Voliva, Dr. Wennstrom, and Dr. Badlani in Mrs. Voliva's office.

31) At the second meeting on January 19, 2016, Dr. Wennstrom shared with Mrs. Julka that, according to GeoBee, Mrs. Julka was the only individual who created a fraudulent homeschool account to gain access to the 2015-2016 GeoBee contest questions.

32) At the second meeting, Dr. Wennstrom confronted Mrs. Julka and asked her why she went through all the trouble to create a secret account, but then ultimately used her own credit card. Mrs. Julka replied that she would never make *that* mistake again.

33) Dr. Wennstrom told Mrs. Julka she had disgraced the school and the District and walked Mrs. Julka to her car.

34) The Julka family went to Florida for a family wedding a vacation from January 22 – 27, 2016. The trip was unrelated to the GeoBee.

35) On February 2, 2016, Ms. Owen and Mrs. Voliva's meeting with Rohan was conducted kindly. Ms. Owen and Mrs. Voliva in no way "interrogated" Rohan. Ms. Owen and Mrs. Voliva treated Rohan with respect and kindness. At this meeting, Rohan stated that he had never seen the 2015-2016 GeoBee contest questions.

36) The administration did not interview Aarav as a part of its investigation.

37) On February 8, 2016, after careful and deliberate consideration, Dr. Wennstrom determined sanctioning the Julka children from academic contests for the remainder of their time with the District was appropriate.

38) On February 8, 2016, Dr. Wennstrom issued a letter to Butler parents informing them generally that academic dishonesty had occurred, but not identifying any names or individuals involved.

39) On February 16, 2016, the Julka family filed a grievance appeal over Dr. Wennstrom's decision.

40) In the Julka family's grievance appeal, Mrs. Julka fabricated a new story about how her brother, Trushar Patel, created the *geowizz57* account and gained access to the materials by mistake.

41) This story about Trushar Patel's involvement is untrue, unfounded, and unsupported by the record.

42) Trushar Patel was not involved in the matter in any relevant part.

43) On March 7, 2016, Dr. Wennstrom, Mrs. Voliva, and the Julkas participated in a resolution meeting in an attempt to settle the matter. At this meeting, Mrs. Julka reiterated her story about her brother's involvement. Ultimately, the two sides were unable to come to an agreement.

44) Whether or not any of the academic contests told Dr. Wennstrom specifically that they were considering disqualifying the Butler District because of the academic dishonesty, it was a legitimate belief that a national contest could respond that way.

45) The investigation began shortly after the parties were unable to reach an agreement at the resolution meeting.

46) It is unlikely that Rohan saw the 2015-2016 WordMasters contest questions prior to taking the test this year.

47) There is no evidence of any wrongdoing on behalf of Dr. Badlani or her family.

48) Mrs. Julka's actions put the good-name and high-academic reputation of Brook Forest and the Butler District at risk.

In addition to the above findings, Ms. Massey also made findings related to the alleged conflict of interest and procedural deficiency claims, alleged student interrogation claims and regarding witness credibility. Such findings included the following:

1) Mrs. Julka was not a credible witness in light of her many shifting and contradictory statements during the grievance interview and throughout both investigation processes. Furthermore, she exhibited the classic signs of someone who was not telling the truth; shifting in her seat, fiddling with her hands, avoiding eye-contact, not giving direct answers to many questions, changing the topic from questions presented, giving rambling answers and changing her story and answers.

2) Trushar Patel was not a credible witness for several reasons. One reason being that it appeared he had been prepared for the interview in between our initial call on April 1, 2016, when he was unaware I would be calling and would not answer investigation questions, and an April 5, 2016 scheduled call.

3) Rohan was appropriately interviewed by school administrators in the course of the internal investigation and was not interrogated.

4) There were no conflict of interest or procedural deficiencies with regard to the resolution meeting. Ms. Roselli's sole purpose during the resolution session was to facilitate discussion between the parties in a productive manner to see if a resolution could have

been reached; Ms. Roselli was not making any formal rulings or decisions at this meeting. The resolution meeting was not mandated by the Uniform Grievance Procedure.

5) There was no conflict of interest or procedural deficiencies with regard to the email communications between the Board President and Dr. Wennstrom related to the filing of the Julka's February 16, 2016 Grievance Complaint. Regardless of the content of such email communications, such were not considered as part of this investigation; this investigator is unaware of the content and has not read the content of such email communications. Furthermore, from the start of this process, it was clear that Dr. Wennstrom was not going to be involved in the grievance investigation process. The Board President specifically appointed a person outside the District who was not involved in and had no prior knowledge of the matter to investigate the complaint. Dr. Wennstrom's only involvement in the investigation was her interview.

As outlined above, on April 11, 2016, the Board of Education affirmed the findings and sanctions previously issued by Dr. Heidi Wennstrom on February 8, 2016, as well as the findings reached by Ms. Massey. Therefore, the following February 8, 2016 sanctions remain in place:

1) Your children are no longer permitted to participate in any Butler 53 School District academic contests and/or competitions, team or individual, while he is a student within the District. Your children are allowed to participate in after school clubs, activities and extracurricular activities that do not have an academic contest and/or competition component.

2) You are not permitted to serve in any capacity as a parent volunteer in any school related contests and/or competitions.

In light of an error within the February 8, 2016 letter brought to the attention of Ms. Massey by the attorney for your children, the Board has directed the District Administration to replace the February 8, 2016 sanctions letter with a revised letter that contains the following revised finding:

1) "The academic dishonesty and cheating which you ~~and your children~~ engaged put all of the District students participating in the contest and the District at risk of being banned from current and future National Geographic Bee contests."

Butler School District 53 has a long standing reputation of academic excellence built upon exceptional teaching and parental support. Butler School District 53 is committed to ensuring student success and accomplishments based upon ethical practices of the student and parent. The academic dishonesty in which you have displayed cast a shadow on the District's reputation and could potentially lead others to question the integrity of the District's achievement. The District regards our academic integrity to be of the highest priority. Academic dishonesty and cheating will not be tolerated in any form.

As you are aware, the District has spent a considerable amount of time and expense on this matter. The District would now like to return our focus to ensuring a successful educational program for all students. The District would like to move forward in collaboration with your family to ensure the best educational program for your children and for all the children of the District. Toward that end and in an effort to engage in a collaborative manner with you, so long as there are no future incidents of academic dishonesty by you or your children and the District is able to refocus its efforts towards its educational programs and students, the Board of Education is open to considering removal of the February 8, 2016 letter and this letter of April 15, 2016 from your children's student record files at the time of their graduation from 8th grade or their transfer out of Butler School District 53.

Sincerely,
Alan E. Hazlik
Alan Hazlik, Board President Butler School District 53

Law Office of Christopher J. Stull
29W204 Roosevelt Road
West Chicago, IL 60185

April 6, 2016

Robbins Schwartz
55 West Monroe, Suite 800
Chicago, IL 60603-5144
ATTN: Attorney Libby Massey

Re: Rohan & Aarav Julka, Minor Children

Dear Attorney Massey,

My office represents the interests of Rohan & Aarav Julka, ages 9 and 11, both of whom are students in District 53. This letter is the formal response of my clients to the currently ongoing investigation being conducted by your office as the attorneys for District 53 in response to a formal grievance filed by my client's parents to the decision to impose sanctions against the children in a letter from Heidi Wennstrom to the Julka family dated February 8, 2016.

It is my understanding that the policies of District 53 require the currently ongoing investigation as part of the administrative proceeding which is pending within District 53 regarding my clients. It is my understanding that the law firm of Robbins Schwartz currently represents District 53 as their attorneys. I am unaware if your firm represents any of the Administrators or employees of District 53 individually.

Under the Uniform Grievance Policy of District 53 ("Policy"), it appears that Heidi Wennstrom conducted an investigation into an initial complaint in her role as Complaint Manager. Her findings, required by the Policy to be based upon a preponderance of the evidence standard, were set forth in her letter of February 8, 2016 (the "Findings Letter"). The Julka family filed for what I assume was considered an appeal of the February 8 decision. Under the Policy the School Board of District 53 ("Board"), the Board directed your office to conduct an investigation to assist the Board in rendering a decision on the appeal of the Complaint Manager's decision within the stated 30 day time frame set forth in the Policy.

I attended the interview of Komal Julka on March 29, 2016 at Butler Jr. High School conducted by you and your associate, Attorney Jennifer Jones of the law firm of Robbins Schwartz. I did not attend the interviews of any other party, and am not aware of the full list of individuals interviewed. I cannot, and herein do not, make any comment on the content of those interviews. My comments are based upon on only the interview of Komal Julka and the written documents I have reviewed.

In preparing this response, I have reviewed the following written materials:

- District 53's response to an Illinois Freedom of Information Act request filed by my client's parents;

Phone: 630.293.6659 • Fax: 630.293.2970 • email: christopher.stull@comcast.net

- The complete District 53 personal file of Aarav Julka obtained from District 53 through a FERPA Release signed by the parents;
- The complete District 53 personal file of Rohan Julka obtained from District 53 through a FERPA Release signed by the parents.

After a review of all of the written materials listed above, it is my observation that there exists absolutely no evidence whatsoever that neither Aarav nor Rohan Julka engaged in any conduct that violated any of the policies of District 53.

Accordingly, I see no evidence at all that supports the sanction imposed by District 53 against either of my clients in the two letters dated February 8, 2016 sent by Heidi Wennstrom to the Julka family.

Specifically, in Paragraph 8 on Page Two of the three-page Findings Letter, the following language appears:

> *"The academic dishonesty and cheating which you* ***and your children*** *engaged put all of the District students participating in the contest and the District at risk of being banned from current and future National Geographic Bee contests."* (Emphasis added)

From the documentation provided, it appears that Heidi Wennstrom had actual knowledge at the time she drafted the Findings Letter that my clients had in fact not engaged in "academic dishonesty and cheating". My clients had taken no steps whatsoever to secure study materials for the competition at issue, and in fact had been withdrawn from the competition voluntarily by their parents and did not actually participate in the competition.

The Findings Letter not only accused my clients in writing of "academic dishonesty and cheating", but also imposed a severe sanction against them in that they have been banned from ever again being allowed to participate in academic contests or competitions while they are students in District 53.

The imposition of such a severe sanction, coupled with the written accusations of "academic dishonesty and cheating" made with actual knowledge of their falsity and with the complete absence of corroborative evidence is a very serious matter.

In addition, there is no documentation whatsoever in the records I reviewed that supports Heidi Wennstrom's assertion that District 53 was "at risk of being banned" from future competition participation. In fact, it appears that the competition itself made the materials available for purchase. There is no evidence that either of my clients had this knowledge, had contacted the competition, or had any ability to influence the content of the competition materials actually used.

Equally troubling is the information that another parent "knew" that the Julka parents had the actual test questions, and reported this to Heidi Wennstrom. How did this other parent have this knowledge? To the best of my information, no sanction

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Done Julka Attachment 8.pdf

has been imposed against this other reporting parent or their child, who actually took the competition test.

Of further concern to my office are the actions of Heidi Wennstrom and those under her direction and control in response to this incident.

It has been reported to me that Kelly Voliva and Lisa Owen interrogated Rohan Julka on February 2, 2016 at his school. What has been related to me is that Rohan was taken out of class during the midst of an exam without prior warning, and was isolated in a room with two adults who then interrogated him about both the National Geographic Bee exam and the Wordmasters exam.

Rohan reports being traumatized by this team interrogation by two adult authority figures regarding the Wordmasters exam, and the suggestion he had cheated. He stated clearly that he did not cheat on the Wordmasters exam, and that he did not request, purchase, or download any materials for the National Geographic Bee exam.

It is reflected in an email dated February 2, 2016 from Kelly Voliva to Heidi Wennstrom and copied to Lisa Owen that Rohan was clear that once his parents realized that they had the actual test questions they withdrew the children from the exam.

It is also clear from the same email message above that the interrogation carried out by Voliva and Owen was in compliance with written instructions given to them by Heidi Wennstrom.

It is my understanding that no one in that isolated room was representing or seeking to protect Rohan's interests, and his parents were not notified, were not present, nor approved or authorized this interrogation. Rohan is 11 years old.

Rohan now believes that if he performs well on a test in the future he will be called a cheater and a liar. He is nervous and apprehensive about attending school and believes he is being punished for something he did not do. He does not know if he will be interrogated again.

I would note that the version of the interrogation related to me was significantly different from the highly summarized version of the questioning that was provided to the parents under the FOIA request submitted by the parents referenced previously. I assume that no verbatim recording of this interrogation was made. I would also note that the interrogators attempted to compel Rohan to admit to cheating on an unrelated competition examination, the WordMasters test. There is no evidence in the record at all to suggest or imply that Rohan engaged in "academic dishonesty and cheating" relative to the WordMasters exam.

It is my understanding that no such interrogation of Aarav Julka, age 9, was conducted.

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Done Julka Attachment 8.pdf

Such interrogation tactics used against an unsuspecting 11 year-old child are highly inconsistent with the content and tenor of Heidi Wennstrom's second three-page letter to the Julka family dated February 8, 2016 (the "Follow-up Letter").

The Follow-up Letter contains numerous accusations against my client's parents, but sets forth no evidence of wrongdoing by my clients. The Follow-up Letter makes numerous references to morality and the harm that "academic dishonesty and cheating" may have on children. The Follow-up Letter does not make any reference to the harm done to my clients by Heidi Wennstrom by making unsubstantiated accusations of "academic dishonesty and cheating" against them, nor the harm done by the interrogation procedures used against Rohan on February 2, 2016; nor the harm done by imposing sanctions against my clients with actual knowledge that my clients did nothing wrong or violative of any District policy.

Further, Heidi Wennstrom sent a letter apparently to the parents of all the children in District 53 on February 8, 2016 (the "Parent Letter") advising the community that "academic dishonesty and cheating" had in fact occurred, that evidence of such "academic dishonesty and cheating" existed, and that sanctions had been imposed against those whom evidence showed were responsible of violating the policies of District 53.

The Parent Letter was sent before the accused parents and children (including my clients) had the opportunity to exhaust their administrative remedies under the Policy, and was sent with actual knowledge that my clients had done nothing violative of any District policy. This information disclosed to the public has served to damage my client's reputations and has exposed them to ridicule and public humiliation.

Further, District 53 has included a copy of the Findings Letter into both of my client's student files. This information falsely accuses my clients of "academic dishonesty and cheating". It is not difficult to assess the damage this unfounded accusation will cause to my clients into their academic and professional future lives.

As my clients are afraid of retribution against them by school administrators and staff, as counsel for District 53 you are advised that my office will continue to represent Rohan Julka and Aarav Julka until further written notice of the termination of such representation. The administrators and employees of District 53 are advised that they are all forbidden from discussing this matter, or any other related matter whatsoever, with my clients without my presence and express written authorization.

Based upon the lack of any evidence of wrongdoing by my clients, on their behalf I am making the following demands:

1. That the sanction imposed against Rohan Julka and Aarav Julka in the Paragraph numbered 1 on page two of the Findings Letter written by Heidi Wennstrom as the Complaint Manager and Superintendent of District 53 be reversed and withdrawn in its entirety;

2. That the copy of the Findings Letter along with any other reference of any nature whatsoever of this incident be removed from the personal permanent and "temporary files" of Rohan Julka and Aarav Julka.

Thank you for your consideration, and if you have any questions, please contact me.

Regards,

CHRISTOPHER J. STULL
COUNSEL FOR ROHAN & AARAV JULKA, MINOR CHILDREN

EXHIBIT 46

This message is confidential. This message may also be privileged or protected by work product immunity or other laws and regulations. If you have received it by mistake, please re-send this communication to the sender and delete it from your system without copying it or disclosing its contents to anyone.

Komal Julka <kjulka57@gmail.com> Thu, Mar 31, 2016 at 6:19 PM
To: Christopher J Stull <christopher.stull@comcast.net>

Sent from my iPhone

Begin forwarded message:

From: Libby Massey <lmassey@robbins-schwartz.com>
Date: March 31, 2016 at 5:51:31 PM CDT
To: Komal Julka <kjulka57@gmail.com>
Subject: Audio Recording

Mrs. Julka,

I wanted to follow up on our conversation from Tuesday and let you know that I will not consider any notes, emails, or statements related to the audio recording of your telephone conversation with Dr. Badlani as part of my investigation. It is my understanding that the School District does not have the recording in its possession, nor do you. I have not heard and will not hear the recording as a part of the investigation.

Please let me know if you have any questions. Thank you –

Libby N. Massey

Attorney

Robbins Schwartz

55 W. Monroe St. Suite 800

EXHIBIT 47

[redacted] (MR # [redacted]

Encounter Date: 01/13/2016

[redacted] (MR# [redacted]

Progress Notes

Progress Notes Info

Author	Note Status	Last Update User	Last Update Date/Time
Rahul Naresh Julka, MD	Signed	Rahul Naresh Julka, MD	1/13/2016 2:26 PM

Progress Notes

DIGESTIVE DISEASE CENTERS

DR. RAHUL N. JULKA, M.D.
5825 Broadway Suite B
Merrillville IN 46410-2664
Phone: 219-981-9000
Fax: 219-981-9510

1 hour commute
~ 55 miles
park car
see patient
and write notes

[redacted] [redacted] [redacted]

[redacted]

Proof Dr. Julka was at work!

4. ppi rx
5. No nsaid's
6. Po as tolerated
7. Surgery referral to [redacted] for f/u re: cholelithiasis and possible need for cholcystectomy

Electronically Signed by:
Rahul Naresh Julka, MD
1/13/16
2:18 PM

Can not release patient info.

not possible. was at work the whole day. And pr... additional patie... notes if need But don't to gi... pati...

[redacted] [redacted] ... MD [redacted]

EXHIBIT 48

To whom it may concern:

I am submitting this letter in response to a forwarded copy of a letter written to Komal and Rahul Julka re: my interview with attorney Libby Massey.

I was notified by Komal and Rahul Julka that my interview with Libby Massey was deemed non-credible and would not be used in her investigation. I find the claim that I was "prepared" for the interview to be insulting and injurious to my character. I also find it incredulous that Ms. Massey would comment that on April 1, 2016, I would not answer investigation questions. Ms. Massey called me in the middle of the work day, without prior notice, while I was in a team meeting with clients, and asked to speak to me. When I responded that I could not speak to her while in a meeting, she ASKED when would be a good time to speak, and I told her Tuesday, April 5, 2016. She AGREED to that date and set up the conversation time. I could not speak to her on Monday, April 4, 2016, because Monday is the day when the company executives meet with team managers and their consultants to discuss project status. No one takes personal time on Mondays, lest one be fired or replaced. As a professional consultant manager for multi-billion dollar clients, I can not excuse myself from work duties at the beck and call of Ms. Massey, and I am sure that if she were engaged in a team meeting during her work day, she would not excuse herself to take a personal phone call.

Overall, I find this twisting of the events and conversation re: my interview to be self-serving and unethical on the part of Ms. Massey.

Sincerely,

Trushar Patel

EXHIBIT 49

Parent Report to Kelly Voliva & Heidi Wennstrom from Mrs. Julka April 27, 2016 of Substitute Teacher Incident in Miss Owen's Class

TIMELINE

4pm

- Parent came in and shared that Rohan was trying to complete something and was hit on the head by the substitute. Parent reported that another student observed this ([redacted] [redacted]

- Kelly Voliva called Monica in the presence to Mrs. Julka, Heidi Wennstrom, and Lisa Owen to speak about this situation.

- According to Mrs. Quinn, she had touched a couple of the students on the head, on the shoulder to get their attention to stop talking while they were working. One of them was Rohan. The class was given their homework and told to put it away. Instead of putting it away, he started doing his homework. Mrs. Quinn redirected him by putting her hand on his head.
  - She remembered ruffling his hair, patting another boy on the shoulder to redirect his attention, as well.
  - Monica reported that she stopped teaching at BF when she had her over 20 years ago but has been subbing at BF for years. She knows the students very well and would never harm a child.
  - She apologized if he took it the wrong way but she in no way hit him or was treating him unkindly.
  - Unfortunately, Rohan and the rest of the class needed some redirecting today. I don't let the room out of control.

- Kelly, Heidi, and Lisa followed up with Mrs. Julka after the phone conversation ended with Mrs. Quinn.
  - HW stated obviously the stories were discrepant and encouraged Mrs. Julka to ask her son more about it when he got home, as possibly he was elaborating.
  - KV and LO both verified that in their experience Rohan has not been truthful with other things, so they questioned the validity of his reporting.
  - All three administrators stated if there was ever a question of a child being hurt by someone, that person would not be welcome back in this building. They thanked Mrs. Julka for reporting and stated they would follow-up with the other student that was witness to the reported event.
  - Miss O agreed to contact this other students and Rohan later this evening.

THURSDAY APRIL 28th

8:45am - Meeting with [redacted] (Kelly Voliva & Lisa Owen)

[redacted] came to Mrs. Voliva's office. KV assured [redacted] he was not at all in trouble but that we needed to ask him about something, because we appreciated his honesty and leadership. KV then asked if he knew why he was here. [redacted] said it was probably about yesterday's classroom behavior.

[redacted] said there was a problem with [redacted] KV said she had heard that but also wanted to talk about another problem. [redacted] said that [redacted] doesn't like [redacted], but he sang a song and bothered her. It was decided that was not a good choice.

Miss Voliva then asked if he could describe anything else that happened, thinking back to his conversation with Miss Owen last night. [redacted] then stated "he didn't think Rohan got hurt but he did see Miss Quinn hit him on the head to get his attention because we wasn't following the directions." KV asked was it a hit or a tap. [redacted] said it was more of a tap. Right after it happened, Rohan said to [redacted] that he felt bad that the teacher hit him. [redacted] said it didn't look like it hurt but maybe it was harder than it should have been. [redacted] explained what was happening in the room at time - sitting at side of room, after crossword puzzle, [redacted] stated again that Rohan was not physically hurt, maybe just emotionally from what Rohan said after.

Mrs. Voliva then asked [redacted] if he has ever seen a teacher physically hit anyone. [redacted] said "no." [redacted] said that Mrs. Quinn did give a direction that Rohan didn't follow. [redacted] said that he saw Mrs. Quinn's hands on Rohan's head. He saw her fingers move in his hair. It didn't look hard at all. When asked again to describe the hit, [redacted] said that he never saw a hit that would hurt "even the littlest kid." [redacted] said that Rohan is exaggerating.

Mrs. Quinn was brought in at the end of the conversation and [redacted] verified the story in Mrs. Quinn's presence.

After Mrs. Quinn left the room, Mrs. Voliva and Miss Owen again thanked [redacted] for being so honest, as these were pretty serious allegations against an adult that has worked in our school for a long time but that our job is to make sure that no one is being hurt in our school. He asked if we were going to talk to Rohan since he was the one involved. We said "yes." Miss Owen closed by asking [redacted] not to talk about this incident with other students and assured him if he had any questions, he could talk to her, Mrs. Voliva, and of course, his parents.

8:55am - Meeting with [redacted] Singh (Kelly Voliva & Lisa Owen)

[redacted] said that Mrs. Julka called him. Mrs. Julka asked [redacted] if he saw the sub hit Rohan on the head. [redacted] did not see anything. He told that to Mrs. Julka on the phone last night, as well.

9:00am - Meeting with Rohan Julka (Lisa Owen/ Kelly Voliva & Ann Wolff)

Mrs. Voliva asked Rohan to tell her what happened yesterday in 5-O. Rohan said the class was watching Liberty Kids. The previews were started and the kids had been given a crossword. Kelly asked why he was doing the crossword. He said because he wanted to get it done. KV asked again if he was supposed to be doing it. Rohan first said "I don't know." KV said this is a "yes or no" answer. Rohan then said "no, I wasn't following the directions." He admitted he was not following directions because the crossword puzzle was supposed to be put away but he just wanted to complete "one last word."

KV then asked if Mrs. Quinn hit him. Rohan said she did but he doesn't know if it was on purpose or on accident but it was when she told him to put the crossword away.

KV then asked him what he told his mom after school. Rohan said he told his mom that the sub hit him. KV said did you say it was on purpose to your mom or an accident. He said "on purpose." He then said "[redacted] saw it too."

Mrs. Voliva then told Rohan they has just spoken to [redacted]. [redacted] did state he saw Mrs. Quinn hit him on the head but it was not hard. He actually told us it was not even something that would hurt the smallest child and even said you seemed to be exaggerating.

Rohan responded that it felt very hard to him. He said, "It was me that got hurt." KV reiterated that she doesn't ever want a student to get hurt in her building.

Mrs. Voliva asked if Rohan realized that Mrs. Quinn could lose her job. He said that yes he understood this, as his mom explained that to him too.

Again, it was asked if the touch was by accident or on purpose? Rohan said he didn't know.

Again, it was asked if it was light or hard. He said medium. Rohan again said he shouldn't have been doing the crossword but the "hit" made his head hurt for 1 minute. KV asked for him to demonstrate the hit. Rohan demonstrated the hit on Kelly's head.

Mrs. Quinn then came into the office. She stated that it was a crazy day. The students corrected yesterday's homework and directed the students to put their new HW in folder, backpack, etc. She specifically said not to work on it. Rohan agreed that he heard those directions, but he wanted to work on homework.

Statement from Monica Quinn, Elementary Substitute Teacher
Butler School District 53
April 28, 2016

Mrs. Voliva and Dr. Wennstrom contacted me over the phone yesterday afternoon, after I had left from subbing in Miss Owen's room. Rohan's mother, Mrs. Julka, was present during the initial conversation.

The following is my statement of what occurred on the afternoon of April 27, 2016:

We had just finished checking some homework and students were then given some homework for the night. The whole class was given the direction to put their homework away. They were then told to have a seat, as we were beginning a social studies video.

Instead of following the directions, Rohan started working on his homework. I walked over to him, put my hand on his head, and lovingly ruffled his hair and told him to put away his homework and get to his seat. This was nothing more than a gesture to get him back on task.

I heard nothing more from him the rest of the afternoon. I later gave the students a piece of candy for following directions and working quietly. The class was really very rowdy all day, so there were several students that needed some redirection.

When asked to come in by Administration this morning to make a statement, I felt it was absolutely necessary to come in and stand my ground. I was very upset last night that a child I have known and cared about for two years would accuse me of hitting him. I have worked in the district for many, many years and would never, ever harm a child. I think it is extremely sad that a student can make such false reports about a person.

I am a former employee of Butler School District that left only to raise my own children. This is not a job I need to do for pay. I have been subbing out of kindness to my former Brook Forest colleagues and have really grown to love the children over the past three years I've been back as a substitute. It saddens me these false reports have been made, as it can be damaging to my character. I want to be sure these false accusations are not made against me or any other person at Brook Forest.

Oak Brook Police Department Crime Report

Case No. **OP16008333**
Report No. **OP16008333.1**
Report Date: **4/28/2016**

Oak Brook Police Department
1200 Oak Brook Rd
Oak Brook, IL 60523
630 368-8701

1

Subject: **0460 - BATTERY**

Case Report Status: **A - Approved**

Occurred On (and Between): **4/27/2016 2:00:00 PM**

Location: **60 Regent DR- Brook Forest School**
Jurisdiction: **OB - Oakbrook PD**
Grid: **OB01 - ZONE 1**
Sector: **194V - 194V**
Map: **OB - OAK BROOK**
Census/Geo:
Call Source: **Telephone - UDT**

Vehicle Activity:
Vehicle Traveling:
Cross Street:

Date Entered: **4/28/2016 1:27:35 PM**
Entered By: **PP68 - Plinske, Paul**
Date Verified:
Verified By:
Date Approved: **4/28/2016 2:28:46 PM**
Approved By: **DJ27 - Jacobs, Doug**

Connecting Cases:
Disposition: **Active**
Clearance Reason:
Date of Clearance:
Reporting Agency: **Oak Brook Police Department**
Division: **Oakbrook**
Notified:

Means:
Other Means:
Motive:
Other Motives:

Reporting Officer: **PP68 - Plinske, Paul**

Assisted By:

Report Narrative

Juvenile Not for Publication

Battery
No Complaints to be signed

On 04/28/16 at about 1224 hours I responded to the Oak Brook Police department for a delayed battery report. Upon my arrival I spoke to the complainant who was identified as JULKA, ROHAN and his mother who was identified as JULKA, KOMAL.

ROHAN advised on 04/27/16 he was in his 5th grade classroom (Ms. Owen's Room) at Brook Forest School when he was struck by substitute teacher Ms. QUINN. ROHAN stated at about 1400 hours the class was getting ready to watch a film about the Boston Tea Party. ROHAN stated during the opening credits, he was attempting to finish the last word on his crossword puzzle when Ms. QUINN walked up to him and struck him on the right side of his head with the palm of her right hand. ROHAN stated Ms. QUINN had previously asked him to put the crossword puzzle away. ROHAN stated this caused a headache for "one minute". ROHAN stated he did not see the school nurse for his injury. ROHAN stated classmate [redacted] witnessed the incident. I asked KOMAL if she examined ROHAN's head when she saw him after school, and she advised she did, but did not feel any bumps or see any visible injury to the right side of ROHAN's head.

KOMAL stated she went back to the school and spoke to Principal VOLIVA and the Superintendent, asking what happened with her son and Ms. QUINN. KOMAL advised she granted permission for VOLIVA to speak to ROHAN during the next school day to determine what happened in the classroom on 04/27/16.

ROHAN stated he spoke to Principal VOLIVA, Ms. QUINN and Ms. WOLFF on 04/28/16. ROHAN stated VOLIVA accused him of lying and compared him to the story of the boy who cried wolf. ROHAN stated when he asked his friend [redacted] what he had told Principal VOLIVA, Ms. QUINN, and Ms. WOLF, he stated [redacted] told him they pressured him into saying ROHAN was lying about the incident. ROHAN stated he was very upset and when his mother brought him lunch on 04/28/16, he asked that she take him out of school for the day.

KOMAL advised she does not wish to pursue criminal charges.

KOMAL and ROHAN were advised that Officer Church #74 would follow up on this initial report.

I provided KOMAL with the report number and I returned to patrol.

Offense Detail: 0460 - BATTERY

Offense Description: **0460 - BATTERY**
IBR Code:
IBR Group:
Crime Against:
Using:

Criminal Activity:
Weapons/Force:

Location: **300 - SCHOOL**
Offense Completed?: **Yes**
Offense Status:
Hate/Bias: **88 - None (No Bias)**
Domestic Violence: **No**

No. Prem. Entered:
Entry Method:
Type Security:
Tools Used:

Oak Brook Police Department Crime Report

Case No. **OP16008333**
Report No. **OP16008333.1**
Report Date: **4/28/2016**

Oak Brook Police Department
1200 Oak Brook Rd
Oak Brook, IL 60523
630 368-8701

Suspect S1: Ms. QUINN

Suspect Number	S1	DOB		Place of Birth	
Name	Ms. QUINN	Age	01-99	SSN	
AKA		Sex	F - Female	DLN	
Alert(s)		Race	U - Unknown	DLN State	
		Ethnicity	U - Unknown	DLN Country	
Address		Ht.		Occupation/Grade	Substitute Teacher
CSZ		Wt.		Employer/School	Brook Forest School
		Eye Color		Employer Address	60 Regent DR
		Hair Color		Employer CSZ	Oak Brook, IL 60523
Home Phone		Hair Style		Res. County	
Work Phone		Hair Length		Res. Country	
Email Address		Facial Hair		Resident Status	U - Unknown
		Complexion			
		Build			
		Teeth			

Scars/Marks/Tattoos
Suspect MO
Other MO
Attire
Habitual Offender Status

Suspect Notes

Victim V1: JULKA, ROHAN R.

Victim Code	V1	Victim Of	0460 - BATTERY		
Victim Type	I - Individual				
Name	JULKA, ROHAN R.	DOB	9/5/2004	Place of Birth	
AKA		Age	11	SSN	
Alert(s)	JS - Juvenile - SHO	Sex	M - Male	DLN	
		Race	W - White	DLN State	
		Ethnicity	N - Not of Hispanic Origin	DLN Country	
Address	717 SAINT JOSEPHS DR	Ht.		Occupation/Grade	5th Grade
CSZ	OAK BROOK, IL 60523	Wt.		Employer/School	Brook Forest School
		Eye Color		Employer Address	60 Regent Dr.
Home Phone		Hair Color		Employer CSZ	Oak Brook, IL 60523
Work Phone		Facial Hair		Res. County	DuPage
Email Address		Complexion		Res. Country	USA - United States of America
				Resident Status	R - Resident
				Testify	

Attire
Injury
Circumstances

Law Enforcement Officer Killed or Assaulted Information	
Type	
Assignment	
Activity	
Other ORI	

Justifiable Homicide Circumstances	

Victim Offender Relationships

Offender	Relationship

Victim Notes

Witness W1: [redacted]

Witness Code	W1	DOB		Place of Birth	
Name	[redacted]	Age		SSN	
AKA		Sex	M - Male	DLN	
Alert(s)		Race		DLN State	
		Ethnicity		DLN Country	
Address		Ht.		Occupation/Grade	
CSZ		Wt.		Employer/School	

Oak Brook Police Department Crime Report

Case No. OP16008333
Report No. OP16008333.1
Report Date: 4/28/2016

Oak Brook Police Department
1200 Oak Brook Rd
Oak Brook, IL 60523
630 368-8701

Home Phone		Eye Color		Employer Address	
Work Phone		Hair Color		Employer CSZ	
Email Address		Facial Hair		Res. County	
Attire		Complexion		Res. Country	
Witness Notes				Resident Status	
				Testify	

Other Entity: O1 -- OWEN, LISA

Entity Code	O1				
Entity Type	I - Otherwise Involved				
Name	OWEN, LISA	DOB		Place of Birth	
AKA		Age		SSN	
Alert(s)		Sex	F - Female	DLN	
Address		Race		DLN State	
CSZ		Ethnicity		DLN Country	
Home Phone		Ht.		Occupation/Grade	Asst. Principal/ 5th Grade
Work Phone		Wt.		Employer/School	Brook Forest School
Email Address		Eye Color		Employer Address	60 Regent DR
Attire		Hair Color		Employer CSZ	Oak Brook, IL 60523
Entity Notes		Facial Hair		Res. County	
		Complexion		Res. Country	
				Resident Status	

Other Entity: O2 -- VOLIVA, KELLY

Entity Code	O2				
Entity Type	I - Otherwise Involved				
Name	VOLIVA, KELLY	DOB		Place of Birth	
AKA		Age		SSN	
Alert(s)		Sex	F - Female	DLN	
Address		Race		DLN State	
CSZ		Ethnicity		DLN Country	
Home Phone		Ht.		Occupation/Grade	Principal
Work Phone		Wt.		Employer/School	Brook Forest School
Email Address		Eye Color		Employer Address	60 Regent DR
Attire		Hair Color		Employer CSZ	Oak Brook, IL 60523
Entity Notes		Facial Hair		Res. County	
		Complexion		Res. Country	
				Resident Status	

Other Entity: O3 -- WOLFF, ANNMAREE

Entity Code	O3				
Entity Type	I - Otherwise Involved				
Name	WOLFF, ANNMAREE	DOB		Place of Birth	
AKA		Age		SSN	
Alert(s)		Sex	F - Female	DLN	
Address		Race		DLN State	
CSZ		Ethnicity		DLN Country	
Home Phone		Ht.		Occupation/Grade	Social Worker
Work Phone		Wt.		Employer/School	Brook Forest School
Email Address		Eye Color		Employer Address	60 Regent Dr.
		Hair Color		Employer CSZ	Oak Brook, IL 60523
		Facial Hair		Res. County	

Oak Brook Police Department Crime Report

Case No. **OP16008333**
Report No. **OP16008333.1**
Report Date: **4/28/2016**

Oak Brook Police Department
1200 Oak Brook Rd
Oak Brook, IL 60523
630 368-8701

Attire
Complexion
Res. Country
Resident Status

Entity Notes

Other Entity: O4 -- [E] Brook Forest School

Entity Code	O4				
Entity Type	O - Other Entity (Business, Institution, Etc.)				
Name	[E] Brook Forest School	DOB		Place of Birth	
AKA		Age		SSN	
Alert(s)		Sex		DLN	
		Race		DLN State	
Address	60 Regent DR	Ethnicity		DLN Country	
CSZ	Oak Brook, IL 60523	Ht.		Occupation/Grade	
		Wt.		Employer/School	
Home Phone		Eye Color		Employer Address	
Work Phone	630 325-6888	Hair Color		Employer CSZ	
Email Address		Facial Hair		Res. County	DuPage
		Complexion		Res. Country	USA - United States of America
Attire				Resident Status	
Entity Notes					

Other Entity: O5 -- JULKA, KOMAL R.

Entity Code	O5				
Entity Type	I - Otherwise Involved				
Name	JULKA, KOMAL R.	DOB	6/15/1975	Place of Birth	
AKA		Age	40	SSN	
Alert(s)		Sex	F - Female	DLN	J420-5167-5770
		Race	W - White	DLN State	IL - Illinois
Address	717 SAINT JOSEPHS DR	Ethnicity	N - Not of Hispanic Origin	DLN Country	USA - United States of America
CSZ	OAK BROOK, IL 60523	Ht.		Occupation/Grade	
		Wt.		Employer/School	
Home Phone	630 806-6112	Eye Color		Employer Address	
Work Phone		Hair Color		Employer CSZ	
Email Address		Facial Hair		Res. County	DuPage
		Complexion		Res. Country	USA - United States of America
Attire				Resident Status	R - Resident
Entity Notes					

Garrett Church

From:	Garrett Church
Sent:	Monday, May 02, 2016 8:00 AM
To:	Garrett Church
Subject:	Information Request
Sensitivity:	Private

On Thursday 04/28/16 around 2:00pm there was a reported incident involving a student and faculty member in Mrs. Owens classroom. The incident occurred around the time the movie that was being shown had started. Your child was not involved and is not in trouble however they MAY be a witness to what occurred. Could you please reach out to them and ask them if they are aware of or witnessed this incident. I am trying to be as least disruptive as possible while uncovering any possible facts for this case. If you could please get back to me I would greatly appreciate it. My phone number is 630-368-8734 and I am available M-F 8am-4pm.

Thank you in advance for your assistance,

Garrett Church

Garrett Church #74
Support Services Officer
Oak Brook Police Department
1200 Oak Brook Rd Oak Brook, IL 60523
Phone: 630-368-8734
Fax: 630-368-8735
Email: gchurch@oak-brook.org
Web: http://www.oak-brook.org/Police Follow us:

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Electronic messages sent to and from the Village of Oak Brook may be subject to discovery under the IL Freedom of Information Act.

Think Green! Please consider our environment before printing this electronic message.

Oak Brook Police Department Follow-Up Report

Case No. **OP16008333**
Report No. **OP16008333.2**
Report Date: **5/6/2016**

Oak Brook Police Department
1200 Oak Brook Rd
Oak Brook, IL 60523
630 368-8701

1

Subject: **0460 - BATTERY**

Case Report Status	A - Approved	Date Entered	5/6/2016 11:25:01 AM	Reporting Officer	
		Entered By	GC74 - Church, Garrett		PP68 - Plinske, Paul
Occurred On	4/27/2016 2:00:00 PM	Date Verified			
(and Between)		Verified By			
		Date Approved	5/11/2016 3:32:59 PM		
Location	60 Regent DR- Brook Forest School	Approved By	BK58 - Kadolph, Benjamin	Assisted By	
Jurisdiction	OB - Oakbrook PD	Connecting Cases			
Grid	OB01 - ZONE 1	Disposition	Inactive		
Sector	194V - 194V	Clearance Reason			
Map	OB - OAK BROOK	Date of Clearance			
Census/Geo		Reporting Agency	Oak Brook Police Department		
Call Source	Telephone - UDT	Division	Oakbrook		
		Notified			
Vehicle Activity		Means			
Vehicle Traveling		Other Means			
Cross Street		Motive			
		Other Motives			

Report Narrative

JUVENILE NOT FOR PUB

On 4/28/16 around 1224 hours I sat in on a station report for a battery that occurred at Brook Forest School with officer Plinske. Komal Julka and her son Rohan were present for the report. Rohan stated on 4/27/16 around 1400 hours he was asked by substitute teacher Monica Quinn to put his crossword puzzle away and focus on the video that was starting to play. Rohan stated he was trying to finish up one last word when Quinn walked over to him and slapped him on the right side of his head with the palm of her right hand again asking him to put the puzzle away and focus on the video. Rohan stated he had a headache for one minute but did not complain of injury or request to see the nurse. Rohan stated that [redacted] was sitting next to him and observed the incident. Komal stated she was not interested in pursuing criminal charges against Quinn but wished to obtain the truth as she felt the school did not treat her son fairly or with respect in their interview due to other ongoing matters between the Julka family and the school.

On 4/28/16 Thursday at 1807 hours I received a voice message from Komal Julka who stated she had additional information she wished to add to the report after again speaking to her son and attorney.

On 4/29/16 Friday I called Julka back at 0730 and left her a message. At 0743 I received an email from Rahul Julka detailing and recapping the incident and comments made during the interview with the school and Rohan Julka.

On 4/29/16 around 1405 I spoke with school secretary Barbara Mini who was able to email me a list of all students present in Miss Owens class on the date of the incident. Around 1515 I had a phone conversation with Komal Julka where she again reaffirmed she was not interested in signing complaints against Quinn but only documenting the truth of the incident regarding the events and the way the school treated her son. Julka emailed me a photo of Rohan's statement stating it depicted him being forced to change his statement (See attached). Julka was dismissive to me stating that I planned on reaching out to all potential witnesses to obtain statements. Julka wished that I concentrate on [redacted] who stated he observed the incident and that there was possibly one other child sitting next to Rohan who witnessed the event. Julka stated everyone else was busy watching the video and would not have seen the incident.

On Sunday 5/1/16 at 1934 I received a message from Wennstrom stating Julka and [redacted] had each retained legal counsel and were no longer allowed to be interviewed by the school.

On 5/2/16 Monday at 0800 I sent out a very brief email to the parent's email that was provided by the school. The email was sent to 1 parent of each student requesting they have a conversation with their child and reply to me via telephone informing me if their child witnessed the incident or not.

On 5/2/16 at 0934 Kelly Voliva emailed me the notes and statements that were taken from the interview at the school. The email also contained the written statement in a separate document from Monica Quinn.

On 5/2/16 at 1024 hours Heidi Wennstrom emailed me stating that on 4/28/16 they placed a mandated call to DCFS and that Voliva and Wennstrom were the reporters for the case. DCFS case worker Jason Hasquan provided the intake number of 13203260. They were informed that the case would not be accepted as it did not meet the criteria for DCFS to become involved. Wennstrom advised Quinn had been placed on leave while the investigation was under way and they would cooperate fully with the investigation.

On 5/2/16 at 1636 Julka emailed me stating she was displeased I found "the investigation to be disruptive to the class" and again stated she wished that I only speak to two children sitting by Rohan as she was afraid the investigation would give her a

Oak Brook Police Department Follow-Up Report

Case No. **OP16008333**
Report No. **OP16008333.2**
Report Date: **5/6/2016**

Oak Brook Police Department
1200 Oak Brook Rd
Oak Brook, IL 60523
630 368-8701

2

bad reputation.

On 5/2/16 at 1649 I had a phone conversation with Voliva who called me to inquire as to when the interviews would be conducted and if parents could be present. I advised Voliva I was unable to proceed further until I received a response from a potential witness and at this point I have not had such contact. Voliva stated she was concerned parents may not check their email and the school sent a blackboard message to the involved parents which she was certain would be received.

On 5/2/16 at 1707 Julka sent a very similar email as the one sent at 1636 hours but this time referencing [redacted] by name.

On Tuesday 5/3/16 at 1810 Julka sent me an email stating that another boy came forward as a witness and stated that he observed Quinn slap Rohan. She provided a name [redacted]. Julka stated again that she had no intentions to pursue charges.

On Thursday 5/5/16 I left a voicemail at the [redacted] residence requesting a call back advising them they were named as a potential witness in this case.

On Friday 5/6/16 I left a voicemail at the [redacted] residence to confirm if their son had secured legal counsel and if they wished to speak to me or not to confirm that one way or the other.

On 5/6/16 around 1100 I contacted Quinn via the telephone. I asked Quinn to meet with me to go over her statement. I advised Quinn I had already been forwarded a copy of her written statement. Quinn stated she was advised not to proceed any further or made additional statements without an attorney present. I told Quinn I had no issues with her attorney being present. Quinn called me back at 1150 stating she was unable to get a hold of her attorney or anyone who could assist her in her decision. Quinn stated that her written statement was true and accurate and that she would call me back and try to have this resolved early next week at the latest.

On 5/6/16 at 1600 hours no other phone calls or messages have been received at this time regarding this incident. I sent a follow up email to Julka to brief her on the progress.

On 5/10/16 at 1130 hours Quinn came to the PD per my request and was accompanied by Ann Wolff. Quinn stated that her written statement was true and accurate and there was nothing she would add or retract from it. Quinn stated that after a verbal warning to Rohan the first time to put his homework away she went over to him after he did not comply. Quinn stated she put her hand on his head and ruffled his hair stating to put his homework away and watch the video. Quinn stated at no point did Rohan complain of pain, make any comments or gestures to indicate he was in pain, or request to see the nurse about it. Quinn stated that she has been teaching for a long time and that the actions she took would have been exactly the same for any student at any time given the same set of circumstances.

On 5/11/16 at 1145 hours Julka came to the PD per my request to brief her on our investigation with Sgt Kadolph being present. Through our communication Julka again reaffirmed that she was not wishing to pursue charges against Quinn. We discussed the steps we took to pursue any valid leads and as a result of our investigation came to the conclusion that there was not probable cause to support a battery charge. I advised Julka that if any significant information was to come forward in the future we could always reopen the case pending new evidence.

To date I have not heard back from any of my attempts to contact the [redacted] family. No other witnesses have come forward wishing to provide a statement regarding the incident.

At this time I am requesting this case be closed due to the complainant not wishing to sign complaints and lack of leads to establish probable cause.

Offense Detail: 0460 - BATTERY

Offense Description	0460 - BATTERY				
IBR Code		Location	300 - SCHOOL		
IBR Group		Offense Completed?	Yes	No. Prem. Entered	
Crime Against		Offense Status		Entry Method	
Using		Hate/Bias	88 - None (No Bias)	Type Security	
Criminal Activity		Domestic Violence	No	Tools Used	
Weapons/Force					

Suspect S1: QUINN, MONICA M

Suspect Number	S1	DOB	[redacted]	Place of Birth	
Name	QUINN, MONICA M	Age	55	SSN	
AKA		Sex	F - Female	DLN	
Alert(s)		Race	W - White	DLN State	
		Ethnicity	N - Not of Hispanic Origin	DLN Country	

Oak Brook Police Department Follow-Up Report

Case No. **OP16008333**
Report No. **OP16008333.2**
Report Date: **5/6/2016**

Oak Brook Police Department
1200 Oak Brook Rd
Oak Brook, IL 60523
630 368-8701

Address	[redacted]	Ht.		Occupation/Grade	Substitute Teacher
CSZ		Wt.		Employer/School	Brook Forest School
Home Phone	[redacted]	Eye Color		Employer Address	60 Regent DR
Work Phone		Hair Color		Employer CSZ	Oak Brook, IL 60523
Email Address		Hair Style		Res. County	
		Hair Length		Res. Country	
		Facial Hair		Resident Status	N - Nonresident
		Complexion			
		Build			
		Teeth			

Scars/Marks/Tattoos
Suspect MO
Other MO
Attire
Habitual Offender Status

Suspect Notes

Witness W1: [redacted]

Witness Code	W1	DOB		Place of Birth	
Name	[redacted]	Age		SSN	
AKA		Sex	M - Male	DLN	
Alert(s)	JS - Juvenile - SHO	Race		DLN State	
		Ethnicity		DLN Country	
Address		Ht.		Occupation/Grade	
CSZ		Wt.		Employer/School	
Home Phone		Eye Color		Employer Address	
Work Phone		Hair Color		Employer CSZ	
Email Address		Facial Hair		Res. County	
		Complexion		Res. Country	
Attire				Resident Status	
				Testify	

Witness Notes

Witness W2: [redacted]

Witness Code	W2	DOB		Place of Birth	
Name	[redacted]	Age		SSN	
AKA		Sex	M - Male	DLN	
Alert(s)		Race		DLN State	
		Ethnicity		DLN Country	
Address		Ht.		Occupation/Grade	
CSZ		Wt.		Employer/School	
Home Phone		Eye Color		Employer Address	
Work Phone		Hair Color		Employer CSZ	
Email Address		Facial Hair		Res. County	
		Complexion		Res. Country	
Attire				Resident Status	
				Testify	

Witness Notes

Garrett Church

From: Rahul Julka [rjulkamd@gmail.com]
Sent: Friday, April 29, 2016 7:43 AM
To: Paul Plinske; Garrett Church
Cc: komal julka
Subject: Incident # OP16008333, 4/28/16

Hello Officers,

thank you for your help in advance. Please see below some of the pertinent items/facts surrounding the events of April 27, April 28 involving my 11 year old son, my wife, and the Brook Forest Elementary School. I have tried to send you what happened from the point of view of Rohan (my son) and Komal (my wife) as they are the two who interacted with the school on those days. The items below are from an email I am drafting to send to the school in response, and when that is completed, I can forward that as well in its entirety. Please do not hesitate to contact either Komal or I if you have questions re: the below thoughts. Please note that my wife was present and a first person witness to Superintendent Heidi Wennstrom and Principal Kelly Voliva trying to get my son to change his written statement by telling him they didn't believe him, and by stating out loud in front of him that the substitute teacher would be fired and lose her job if he said that she hit him.

Sincerely,

Rahul N. Julka
630-306-6460

Komal R. Julka
630-806-6112

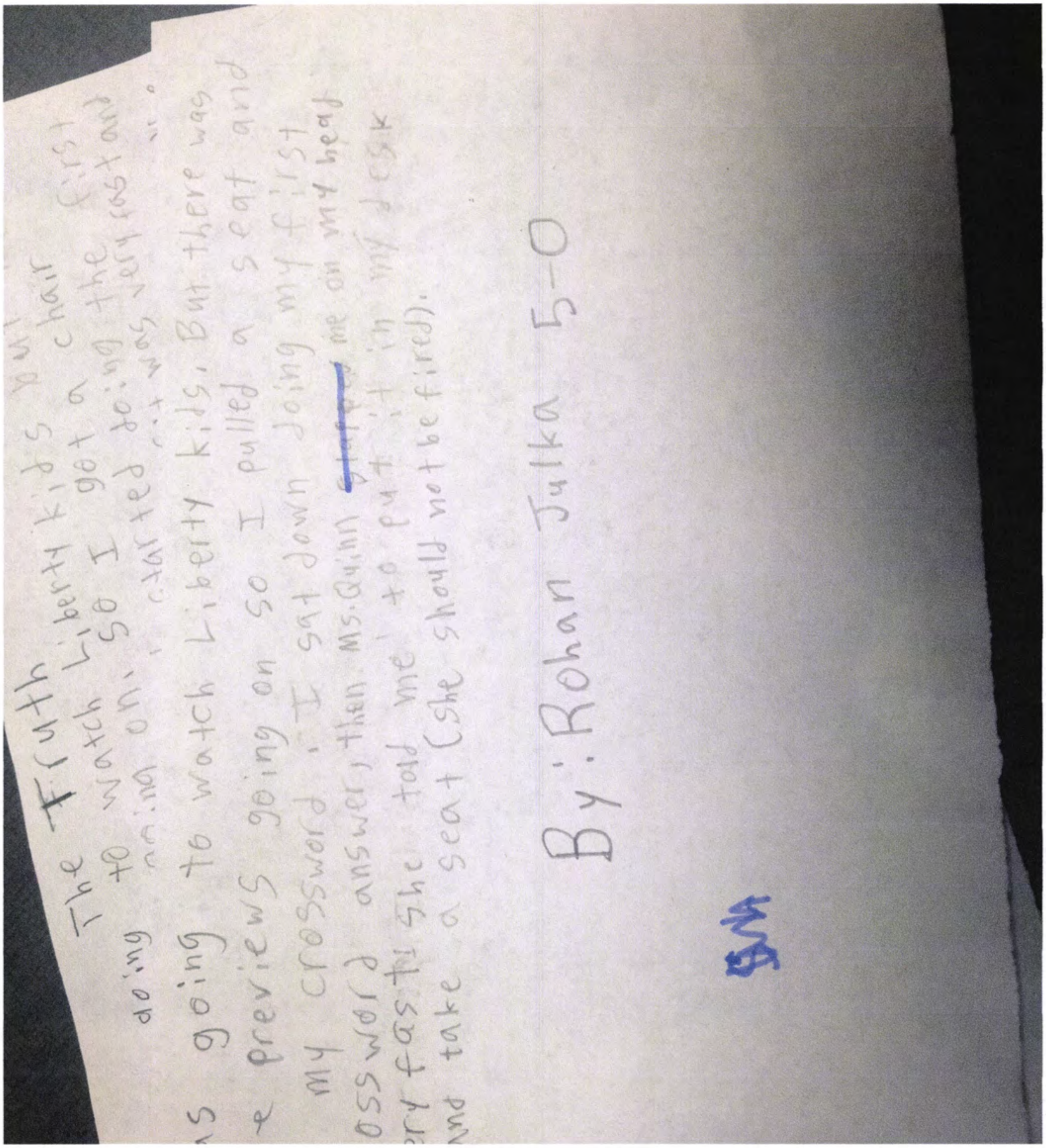
First of all, it is my understanding that when Rohan was picked up after school on Wednesday April 27th, he reported to my wife that he had been struck by a substitute teacher at the school, Ms. Quinn. It is also my understanding that my wife came to the school that afternoon and asked to speak to Mrs. Voliva (principal), at which time she entered Mrs. Voliva's office and spoke to both Mrs. Voliva and Dr. Wennstrom (superintendent). My wife reported what Rohan had told her, and asked what had occurred to lead this to happen. I was told that Ms. Owen (Rohan's homeroom teacher) was called to the office, and that Ms. Quinn was called via telephone with my wife in the room. I was also told that Ms. Quinn's response to Dr. Wennstrom's questioning her about the incident was that she admitted to physically contacting Rohan but that she had just "ruffled" his hair, and her fingernail must have hit his head. After this, it is my understanding that my wife stated that Rohan had told her the names of two classmates that may have seen the incident, and she gave you these names. My wife left with Dr. Wennstrom telling her that the school would look further into the incident.

On Thursday April 28th, Rohan was brought to Mrs. Voliva's office, where he was questioned by Mrs. Voliva, Ms. Owen, Ms. Quinn, and Mrs. Wolfe (school psychologist?) for nearly an hour. Rohan's account to me is that he felt as if Mrs. Voliva was yelling at him and angry at him. Other points that he told me about re: the meeting:

1. Mrs. Voliva telling Rohan that Mrs. Quinn did not hit him, and she knew it.
2. Mrs. Voliva calling Rohan the "boy who cried wolf".
3. Mrs. Voliva repeatedly asking Rohan to hit her in order to show her how hard Ms. Quinn had hit him.
4. When asked, Rohan stating that he felt Ms. Quinn had struck him on purpose, not by accident.
5. Rohan didn't understand why he was being questioned as if he had done something wrong when all he did was report that he was hit on the head.
6. Mrs. Voliva telling Rohan that she didn't believe that he was hit that hard.
7. Mrs. Voliva telling Rohan that the other student who saw Ms. Quinn hit him said that the force of the hit was not that hard, and would not hurt a baby.
8. Rohan saying that maybe he is feeble, because the force of the hit hurt him.
9. Mrs. Voliva telling Rohan that if he is feeble, maybe he should be separated from the other children.
10. Mrs. Voliva telling Rohan she doesn't believe him, and that he is a cheater and liar.
11. Mrs. Voliva ending the questioning when Rohan started crying.
12. Rohan going to the school bathroom to continue crying.
13. Rohan asking my wife to take him home at lunch because he is upset, he thinks Mrs. Voliva hates him, and thinks he is a liar.
14. Rohan telling my wife that he will never tell her again if a teacher hits him at school.

I was going to watch Liberty kids. But there was some previews going on so I pulled a seat and got my crossword. I sat down doing my first crossword answer, then Ms.Gunn slapped me on my head very fast! She told me to put it in my desk and take a seat (She should not be fired).

From: Komal Julka kjulka57@gmail.com
Subject: Rohan slap statements
Date: Apr 14, 2017, 4:12:58 AM
To: Rahul Julka rjulkamd@gmail.com



The Truth
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...ming on. so I got a chair
...I started doing the first
...it was very fast and

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By: Rohan Julka 5-O

After this meeting, it is my understanding that Rohan and my wife met with Ms. Owen, who recommended that Rohan write down his version of events how they happened. Rohan wrote down that Ms. Quinn had slapped him on the head. After doing this, Ms. Owen asked Rohan and my wife to wait for Dr. Wennstrom and Mrs. Voliva. Upon entering, Mrs. Voliva told my wife that there were contradictory reports from Rohan about the incident, whether he was slapped/punched/struck, etc. and that she didn't believe his version of events. Dr. Wennstrom asked my wife that Rohan said he was feeble, and is he on any medication. My wife stated that no, he is not on medication, he is a healthy child, and plays soccer. At this time, Dr. Wennstrom also began asking Rohan how hard he **was hit, by asking him to demonstrate on the table. After he did so, she told him that did not seem that hard, and she took cell phone** video of his striking the table. Dr. Wennstrom then proceeded to say that whatever Rohan was saying about Ms. Quinn is a serious offense, and it could make her lose her job and that she has been with the school for over 23 years. At this point, Rohan started crying again, saying that he didn't want to hurt anyone, that he likes Ms. Quinn, and he didn't want anyone to be fired. My wife told Dr. Wennstrom that by saying that Ms. Quinn would get fired, it would just pressure Rohan into writing something inaccurate to prevent hurting Ms. Quinn. Ms. Owen went to get Rohan a water bottle and Kleenex as he was still crying, in fear of hurting Ms. Quinn. My wife tried to calm him down, and told him to be be honest, state the facts only, stick to the truth, and not let the possibility of anyone getting hurt affect him. My wife told Rohan that neither she nor he was trying to get Ms. Quinn fired, and that he should not write anything down to protect anyone, just write the truth of what happened. Rohan was asked to rewrite his statement by Dr. Wennstrom. Rohan was given a fresh piece of paper and again wrote down that he was slapped on the head.

Garrett Church

From: Heidi Wennstrom [hwennstrom@butler53.com]
Sent: Monday, May 02, 2016 10:23 AM
To: Garrett Church; Kelly Voliva
Subject: DCFS Contact--Confidential

Dear Officer Church,

Please know that Brook Forest and District 53 staff will offer our full cooperation in your investigation of the report of battery towards a fifth grade student by a substitute teacher. If there is anything you need to further your investigation, please do not hesitate to let us know how we can help. The report was made after school hours on Wednesday, April 27th. We were able to make a few calls at that time, including speaking with the parent and conferencing calling in the substitute teacher so that they could dialogue together.

On April 28th we made a mandated call to DCFS. Principal Voliva and myself were the reporters for this case. We spoke with Jason Hasquan. He took the information we provided that was derived from our interviews with students and the substitute teacher. The intake ID # 13203260 was given to us at the conclusion of the call. Mr. Hasquin stated that at this time the event does not meet the criteria (lack of evidence of neglect or abuse; no sustained or reported injury; low risk of future harm or injury to the student) for further action. He requested that if more information comes to light in the investigation that is different than or in addition to what we have already reported, that we should be back in touch with their office using the reference Intake ID number, above.

Please provide Ms. Voliva and me with information that may change the initial facts of this case so that we can communicate immediately with DCFS if new information becomes available.

Thank you for your service to our community!

Sincerely,
Heidi Wennstrom

--

Heidi Wennstrom, Ph.D, Ed.D
Superintendentaie
Butler School District 53
2801 York Road
Oak Brook, Illinois 60523

(630) 573-2887
(630) 573-5374 (fax)

4:30pm - Lisa called [redacted] home and spoke to [redacted] Lisa wanted to ask permission to speak to [redacted] about the day's events. [redacted] gave permission and asked her to call back because [redacted] wasn't available. [redacted] did mention if it was about a situation with [redacted] There was no mention of any incident with Rohan and the sub by [redacted]

Lisa called back at 5:00. [redacted] answered and gave the phone to [redacted] Lisa asked how the day went in 5-O. [redacted] responded that Rohan was doing homework and Mrs. Quinn hit him on the head and asked why he was doing homework. [redacted] reports that Rohan got mad. Lisa asked if there were any other situations, and [redacted] didn't give any indication of other problems ([redacted].

Lisa tried calling [redacted] home and mother's cell, but there was no answer at either.

Lisa called [redacted], a student in 5-O who usually has a pulse on 5-O. [redacted] reported that the students did well during the Liberty Kid video. Right after lunch it took a while to quiet down for silent reading. They made cards for Mr. Davis. [redacted] went to band at the end of the day. Lisa asked [redacted] if everyone was respected today. She said [redacted] was blurting out and that she and [redacted] helped Mrs. Quinn with the DVD.

[redacted] called school because she saw the school's phone number on caller ID. Lisa told this mother that she was calling because she wanted to see how the afternoon went in 5-O. She gave the phone to [redacted] He reported that the class did okay. When they were making the cards for Mr. David the kids ran up to get the paper and Mrs. Quinn didn't like that (Mrs. Quinn had told Lisa about this earlier). [redacted] was asked if he was respected. He said yes. Lisa asked if anyone touched anyone on the shoulder or head. He said no. Lisa asked if anything happened with [redacted]. He said no. [redacted] reported that Rohan called him after school (around 4:30 - 5:00), but that he didn't talk to him. [redacted] offered this information without any prompts.

At **6:30** Lisa called the Julka home. Mrs. Julka answered the phone and gave it to Rohan. Lisa said she wanted to talk to Rohan because she had heard that things didn't go like they usually go in 5-O and asked Rohan to tell her what happened this afternoon. Rohan said they were putting on Liberty Kids and he wanted to work on his crossword puzzle. He stated that Mrs. Quinn hit me and it hurt real bad. He said it felt like stingy. Lisa asked where she touched you. He said the middle of the head. Rohan said it felt like she was trying to punch him, like a very hard slap. Rohan reported that he held his head for 3 minutes after this. Lisa asked if he felt respected. Rohab answered that he didn't feel respected, but that he didn't know if she tried to be hard or gentle. Lisa said she was sorry that Rohan felt disrespected. Rohan said that it's fine. Lisa asked how Rohan's head was or if he had a headache now. Rohan said it only hurt for a minute. Lisa reminded Rohan that if there was anything else he should tell her, and that he could share with her tomorrow or anytime.

Mrs. Quinn said that she did put her hand on his head and ruffled his hair. Rohan then stated, "I'm sure you wouldn't /didn't do it on purpose." Rohan said it felt like a big hit. He had a headache for 1 minute. Mrs. Quinn then said that when she passed out the treat during the movie, Rohan didn't say anything about having a headache. Mrs. Quinn then asked why he didn't go to an adult if he was hurt? He said because it hurt for a minute. He confirmed he said nothing to her about his head hurting. Mrs. Quinn then left the room.

Kelly again asked Rohan, "Did Mrs. Quinn punch you?" He said it was a medium hit and felt hard to him. Kelly asked if there was any chance of exaggeration, as she is hearing conflicting stories from student witnesses and Mrs. Quinn. Rohan responded probably not.

Miss Owen then pointed out to Rohan that he has changed his description of the story multiple times now. Last night he reported it to Miss Owen as "punch." His mom reported that he told her it was a "hit." Today he is telling us he wasn't sure it was an "accident" and it's gone from a light, hard, to medium hit.

Kelly reminded Rohan of times that he was not truthful with her: 4th grade science, [redacted] incident, Google incident. Kelly asked Rohan if he knew the story of the boy who cried wolf. Rohan said that he is telling the truth. Rohan got teary. Mrs. Voliva asked why he was getting upset. He said, "I know what happened and you don't believe me." She asked if this could be an exaggeration? Rohan said,in his perspective it "felt like a hit." Rohan described himself as "feeble," so the "slap could have felt like a punch to me." He then said it wasn't a "closed fist punch but she could have just "told him to go back to his seat; she didn't need to touch my head." KV reminded Rohan that he is not here to judge an adult, he is hear to tell his side of the story. KV then said, of course, it is true at no time should an adult put their hands on a child in a hurtful or harmful way. However, she didn't believe Mrs. Quinn intended to hurt him.

Mrs. Voliva asked about Rohan's relationship with Mrs. Quinn. He says he has known her for years. She subbed a lot in 4P and in Mr. S's math class. KV asked if he has ever seen any other child hit by Mrs. Quinn or any other sub. Rohan said no.

KV finished conversation with Rohan indicating the following: "there is no way she would let ANY adult hurt a child in her school. KV then said she will make sure no other adult ever touches him again in the building in any way. KV then told him if he ever feels hurt by an adult or any other person in this school, he should immediately find a safe adult. KV stated to Rohan that she would be investigating further and take care of the situation.

2:15 Rohan's statement later in the afternoon with Heidi Wennstrom, Lisa Owen, Kelly Voliva, Mrs. Julka, and Rohan:

R - I didn't say it was a punch, or a hit. I just think she did it to my head in a nice way. She patted me but it felt like a slap.

R - It didn't feel like a slap, nor a punch.

Mrs. Julka / Mom - "Are you a liar"

Rohan - "for saying it was a slap? Yes"

Mom kept talking to him saying he doesn't have to say things because he doesn't want someone to be in trouble.

HW said she is there to protect the children and it is her job to determine the consequences. However, if someone was hurt in her building, she must call DCFS.

Mrs. Julka said she didn't want to make that big of a deal out of it.

HW said it was her required job. She had no choice if there was an indication a child was harmed.

Mrs. Julka said that she took Rohan out of school because he was upset because Mrs. Voliva was yelling at him.
Mrs. Voliva said "was I talking like this" in a stern voice? Rohan said "yes..some of the time."

Mrs. Voliva asked "is that yelling?" Rohan said "no."

Mrs. Julka said "no but your voice sounds scary sometimes."

Mrs. Voliva said she has to be firm and factual when she is completing an investigation but she never yells.

HW continued to question Rohan about the nature of the hit. Rohan was having difficulty describing it, as he wasn't sure how to describe it. He kept saying, "it wasn't a hit or a punch." Mom / Mrs. Julka interrupted Rohan from continuing stating "then what was it? Don't change your story b/c you don't want to get someone in trouble."

Mrs. Julka then said he doesn't lie. Mrs. Voliva then reminded the entire group of a several times Rohan hasn't been truthful. He admitted he wasn't truthful during those times.

Mrs. Voliva read the statement out loud to all those in the room. As she read it, HW stopped for clarification.

Mom felt the people in the room were making him nervous, which is why he is changing his story.

LO and KV left the room, so Rohan could write his statement.

HW continued to speak with Mrs. Julka and Rohan, as he rewrote his signed statement.

INSERT STATEMENTS HERE HEIDI from you interactions / observations with Julka's while we were out of the room

LO asked [redacted] to make a written statement at the end of the day - *3:15pm*

LO immediately called [redacted] to let her know we had to speak with [redacted] today about the incident. [redacted] expressed her concern and discomfort with her son's continued involvement. She stated that her legal counsel will be involved if there are any other "interrogations" of her son involving this incident.

[redacted] then immediately called. He too requested his son, [redacted], have no future involvement in this incident. LO and KV spoke to him (*3:25pm*), following up with the below email.

Hello [redacted]

Thank you for contacting us regarding your concern. I am happy Miss Owen and I were able to speak to you about the days events.

We appreciate being able to talk with [redacted] about yesterday's classroom behavior. He was complimented for his honesty and told how much we appreciated his leadership.

I hope that is the last time we need to speak with [redacted]. However, as I explained to you, it could be out of our hands. This situation has been turned over to other agencies for possible investigation. I understand you don't want your son involved. I completely understand your perspective. Going forward, please know, you will be contacted prior to any conversation that would involve [redacted] regarding this specific incident.

As promised, I've included the notes from our meeting this afternoon with [redacted] I had to redact the names of the other children for confidentiality purposes. Please don't hesitate to contact us if you have any other questions.

3:30pm

KV & HW made a call to DCFS to report the alleged incident at approximately ***3:30pm.*** They were unable to take our report and asked to make an appointment to talk with us the following morning.

FRIDAY
April 29, 2016

8:30am
Kelly Voliva and Heidi Wennstrom had a phone conference with DCFS to report the incident between Rohan and the Substitute Teacher. We received an incident number to document the report.

Kelly Voliva and Heidi Wennstrom received the following email from Dr. Julka in regards to the incident:

Dr. Wennstrom and Mrs. Voliva,

I decided to write this email to you both in order to clarify a few things re: the events involving Rohan on Wednesday April 27th and Thursday April 28th.

First of all, it is my understanding that when Rohan was picked up after school on Wednesday April 27th, he reported to my wife that he had been struck by a substitute teacher at the school, Ms. Quinn. It is also my understanding that my wife came to the school that afternoon and asked to speak to Mrs. Voliva, at which time she entered Mrs. Voliva's office and spoke to both Mrs. Voliva and Dr. Wennstrom. My wife reported what Rohan had told her, and asked what had occurred to lead this to happen. I was told that Ms. Owen was called to the office, and that Ms. Quinn was called via telephone with my wife in the room. I was also told that Ms. Quinn's response to Dr. Wennstrom's questioning her about the incident was that she admitted to physically contacting Rohan but that she had just "ruffled" his hair, and her fingernail must have hit his head. After this, it is my understanding that my wife stated that Rohan had told her the names of two classmates that may have seen the incident, and she gave you these names. My wife left with Dr. Wennstrom telling her that the school would look further into the incident.

On Thursday April 28th, Rohan was brought to Mrs. Voliva's office, where he was questioned by Mrs. Voliva, Ms. Owen, Ms. Quinn, and Mrs. Wolfe for nearly an hour. Rohan's account to me is that he felt as if Mrs. Voliva was yelling at him and angry at him. Other points that he told me about re: the meeting:

1. Mrs. Voliva telling Rohan that Mrs. Quinn did not hit him, and she knew it.
2. Mrs. Voliva calling Rohan the "boy who cried wolf".
3. Mrs. Voliva repeatedly asking Rohan to hit her in order to show her how hard Ms. Quinn had hit him.
4. When asked, Rohan stating that he felt Ms. Quinn had struck him on purpose, not by accident.
5. Rohan didn't understand why he was being questioned as if he had done something wrong when all he did was report that he was hit on the head.
6. Mrs. Voliva telling Rohan that she didn't believe that he was hit that hard.
7. Mrs. Voliva telling Rohan that the other student who saw Ms. Quinn hit him said that the force of the hit was not that hard, and would not hurt a baby.
8. Rohan saying that maybe he is feeble, because the force of the hit hurt him.
9. Mrs. Voliva telling Rohan that if he is feeble, maybe he should be separated from the other children.
10. Mrs. Voliva telling Rohan she doesn't believe him, and that he is a cheater and liar.
11. Mrs. Voliva ending the questioning when Rohan started crying.
12. Rohan going to the school bathroom to continue crying.

13. Rohan asking my wife to take him home at lunch because he is upset, he thinks Mrs. Voliva hates him, and thinks he is a liar;
14. Rohan telling my wife that he will never tell her again if a teacher hits him at school.

After this meeting, it is my understanding that Rohan and my wife met with Ms. Owen, who recommended that Rohan write down his version of events how they happened. Rohan wrote down that Ms. Quinn had slapped him on the head. After doing this, Ms. Owen asked Rohan and my wife to wait for Dr. Wennstrom and Mrs. Voliva. Upon entering, Mrs. Voliva told my wife that there were contradictory reports from Rohan about the incident, whether he was slapped/punched/struck, etc. and that she didn't believe his version of events. Dr. Wennstrom asked my wife that Rohan said he was feeble, and is he on any medication. My wife stated that no, he is not on medication, he is a healthy child, and plays soccer. At this time, Dr. Wennstrom also began asking Rohan how hard he was hit, by asking him to demonstrate on the table. After he did so, she told him that did not seem that hard, and she took cell phone video of his striking the table. Dr. Wennstrom then proceeded to say that whatever Rohan was saying about Ms. Quinn is a serious offense, and it could make her lose her job and that she has been with the school for over 23 years. At this point, Rohan started crying again, saying that he didn't want to hurt anyone, that he likes Ms. Quinn, and he didn't want anyone to be fired. My wife told Dr. Wennstrom that by saying that Ms. Quinn would get fired, it would just pressure Rohan into writing something inaccurate to prevent hurting Ms. Quinn. Ms. Owen went to get Rohan a water bottle and Kleenex as he was still crying, in fear of hurting Ms. Quinn. My wife tried to calm him down, and told him to be be honest, state the facts only, stick to the truth, and not let the possibility of anyone getting hurt affect him. My wife told Rohan that neither she nor he was trying to get Ms. Quinn fired, and that he should not write anything down to protect anyone, just write the truth of what happened. Rohan was asked to rewrite his statement by Dr. Wennstrom. Rohan was given a fresh piece of paper and again wrote down that he was slapped on the head.

My wife and I are floored at these events. My wife went into the office on a neutral footing, simply asking what happened. She gave names of two children who Rohan said may be able to verify his story. One child reported that he did in fact see Ms. Quinn strike Rohan. Contradictory to Mrs. Voliva's statement to Rohan about what the other student said re: how hard Rohan was hit, that student told Rohan that he did not say that. That student also told Rohan that he was told by Mrs. Voliva that he must have talked with Rohan beforehand about what to say, and that the student actually showed Mrs. Voliva his cell phone log to prove he had not spoken to Rohan.

A child tells his parent that he was struck at school by a teacher, and that parent notifies the school to find out what happened. And the child is "put on trial" and accused of being a liar and the boy who cries wolf? When there is another student who verified that he saw the incident happen? When the teacher admitted that she made physical contact with the child? A significant amount of the questioning Rohan went through was concerning how hard he was struck, and asking him to demonstrate that. How can anyone, let alone an 11 year old child, strike an object with his hand and say, that is exactly how hard I was hit? And how can anyone expect an 11 year old to strike his principal in order to show how hard he was hit? It does not matter subjectively how hard the impact was; the point is that impact was made, and that should never happen. The use of different words like strike, slap, punch, hit, etc. is not "contradictory" stories; to an 11 year old boy, they all mean the same thing - there was some blow to the head. Rohan is 11 years old and is aware of the difference between "ruffling" of the hair and forceful contact.

Rohan has always been a bright, caring, respectful boy ever since birth. He always looks out for others, and has a sweet natured, loving personality. He has always excelled at his studies, and works tirelessly to get good grades, including being in the advanced math program. For a school official to throw in his face an incident from over a year and a half ago re: looking at another student's paper in Science class, and call him a cheater, is uncalled for and only serves to bring down all the work he has been doing to excel in his classes. He has been achieving straight A's in virtually every class, including Science, where he has gotten exemplary marks and comments from his science teacher, and was nominated for STEM National Youth Leadership Foundation this year by his science teacher!

We have noted a significant increase in times that Rohan has been called to the principal's office since January 2016. We can only assume that this is related to the National Geo Bee incident where Rohan was accused of academic dishonesty, but cleared by the school's own investigation. This is not the first time that we have been upset over the way that Mrs. Voliva has spoken to one of our children. What she feels is a "stern" voice as the principal of the school, is often seen as rude, confrontational, and yelling by others, particularly school aged children and their parents, and not just us. We feel that Rohan has been made to suffer by this incident by making him feel as if he did something wrong in reporting being struck by a teacher. We hope this does not happen again.

Garrett Church

From: Komal Julka [kjulka57@gmail.com]
Sent: Monday, May 02, 2016 4:36 PM
To: Garrett Church
Cc: Rahul Julka
Subject: Fwd: Important Letter From Dr. Wennstrom

Hello Officer Church,
I'm sorry you find the investigation disruptive to the class, as stated by the Superintendent of the school. But as I had requested, that the boy sitting next to my son Rohan who witnessed this incident to give his statement. But an email being sent out, stating that you find this investigation disruptive to the class is a bit awkward, as I had requested that you only talk to the two children that were next to my son Rohan Julka. I never once suggested that you disturb the whole class, and still feel as there is no need to. I will get a bad reputation if the parents feel as though I'm disturbing the education of an entire class.

Thank you,
Komal Julka

----- Forwarded Message -----
From: Brook Forest - Barb Mini <bmini@butler53.com>
To: kjulka57@gmail.com
Sent: Monday, May 2, 2016 4:06 PM
Subject: Important Letter From Dr. Wennstrom

May 2, 2016

Dear Fifth-Grade Parents of Students in Miss Owen's Class,

At the conclusion of the school day on Wednesday, April 27th, we received a parent report that a substitute teacher "slapped" or "punched" a student during the 5th grade reading class. When the District receives a report of alleged physical harm to a student, our mandated practice requires that we interview all those involved. The District promptly initiated an investigation into the incident and conducted initial interviews with the student, substitute teacher and two students sitting near the student at the time of the reported incident. While this substitute is a former Butler 53 teacher and a regular substitute for the District, our standard practice is to abstain from utilizing the substitute teacher in question until the investigation is completed. The Oak Brook Police Department received a report filed by a parent regarding this alleged incident and the District is working cooperatively with the Oak Brook Police Department as they proceed with their investigation.

Earlier today, as part of the police investigation, Officer Garrett Church, the School Resource Officer assigned to District 53, reached out to parents via email informing them that he would like to interview all of the students in the class at the time of this alleged incident to determine if they may have personally witnessed the incident. Other students who were present in Miss Owen's class last Wednesday may reach out to Mrs. Voliva if they believe their student has personal knowledge to share. Officer Church will allow parents the opportunity to be present for the interview of their child or the authority to decline to have their child interviewed, as he understands this process can be disruptive to the learning environment.

We sincerely apologize for the disruption to learning as the investigation continues. We are working in full cooperation with the Oak Brook Police Department to resolve this matter as expeditiously as possible. If you have any questions, please do not hesitate to contact me. Thank you for your cooperation.

Sincerely,

Dr. Heidi Wennstrom

This e-mail has been sent to you by BROOK FOREST SCHOOL. To maximize their communication with you, you may be receiving this e-mail in addition to a phone call with the same message. If you no longer wish to receive email notifications from BROOK FOREST SCHOOL, please click here to unsubscribe.

Garrett Church

From: komal julka [kjulka57@gmail.com]
Sent: Tuesday, May 03, 2016 6:10 PM
To: Garrett Church
Subject: Re: Information Request

Hello Officer Church,

I just wanted to inform you that another boy who was sitting behind my son Rohan Julka the day of the incident also came forward and stated that he also witnessed the substitute teacher slap Rohan. The boy's name is [redacted] Though we have no intensions to pursue any charges against the substitute, we would like an accurate report as the principal had called my son a liar.

Thank you again for all your help and assistance in this matter. My family and I greatly appreciate it.

Komal Julka

On Mon, May 2, 2016 at 8:00 AM, Garrett Church <gchurch@oak-brook.org> wrote:

On Thursday 04/28/16 around 2:00pm there was a reported incident involving a student and faculty member in Mrs. Owens classroom. The incident occurred around the time the movie that was being shown had started. Your child was not involved and is not in trouble however they MAY be a witness to what occurred. Could you please reach out to them and ask them if they are aware of or witnessed this incident. I am trying to be as least disruptive as possible while uncovering any possible facts for this case. If you could please get back to me I would greatly appreciate it. My phone number is 630-368-8734 and I am available M-F 8am-4pm.

Thank you in advance for your assistance,

Garrett Church

From: Komal Julka kjulka57@gmail.com
Subject: Fwd: Important Letter From Dr. Wennstrom
Date: Apr 14, 2017, 3:30:44 AM
To: Rahul Julka rjulkamd@gmail.com

----- Forwarded Message -----
From: Brook Forest - Barb Mini <bmini@butler53.com>
To: sjain1sj@yahoo.com
Sent: Monday, May 2, 2016 4:06 PM
Subject: Important Letter From Dr. Wennstrom

BROOK FOREST
ELEMENTARY SCHOOL

May 2, 2016

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Sincerely,

Dr. Heidi Wennstrom

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Robbins Schwartz

55 West Monroe, Suite 800 | Chicago, IL 60603-5144

May 2, 2016

VIA EMAIL AND REGULAR MAIL

Christopher Stull
Law Office of Christopher J. Stull
29W204 Roosevelt Road
West Chicago, Illinois 60185
christopher.stull@comcast.net

Re: Butler School District 53
Rohan and Aarav Julka

Dear Mr. Stull:

I write in response to your letter received April 28, 2016. In this letter you indicate that while Parents sent you a copy of the April 15, 2016, Board determination letter they received, you have not received a letter from the Board regarding the grievance filed by Parents. You have made very clear throughout this process that you are the attorney for the students and not Parents regarding this matter. Please remember that Parents were the individuals who filed a grievance in this matter, and it remains my understanding that you are not representing Parents. If you were, I would have ensured you received a copy of the April 15, 2016, Board determination letter. However, because Dr. and Mrs. Julka are unrepresented, the April 15, 2016, letter was issued directly to their attention, as the individuals who filed the grievance complaint. The Board will not be issuing a separate letter to you as the attorney for the students. Furthermore, you have also indicated that you already received a copy of the April 15, 2016, Board determination letter sent to Parents. Such is the only letter issued related to the Julka's grievance complaint and was issued to Parents on April 15, 2016.

Your April 28, 2016, letter further indicates that you are providing notice as the attorney for the children that the District is forbidden from questioning, interrogating or discussing any such matter with either child in any way without express written authorization and permission from your office. As you are aware, when students are at school or school sponsored activities, District staff and administrators stand *in loco parentis* to students in non-disciplinary as well as disciplinary matters. District Administration has every right to communicate with students regarding their education and need not obtain parental or attorney consent prior to engaging in such communications. The District is obligated to communicate with students to address their academic and behavioral needs, to investigate allegations of misconduct and to issue consequences as appropriate. Based on such, District staff and Administrators are permitted to interview students at school about matters that arise relating to school and school sponsored activities without prior permission from a parent or attorney. School staff will continue to communicate with the Julka students as they deem appropriate in carrying out their educational duties, and they will not be required to obtain parental consent and/or presence prior to engaging in such communications. As the District does with all parents, the District will continue to communicate with Parents regarding its interviews with their children.

Robbins Schwartz

If you have any questions with regard to this letter, please do not hesitate to contact me.

Sincerely,

Caroline A. Roselli

cc: Dr. Heidi Wennstrom, Superintendent
Kelly Voliva, Special Education Director

I received several messages this afternoon regarding an incident at the school involving Rohan Julka. I have been informed a teacher allegedly physically struck Rohan Julka.

A police report has been made, and I will again be representing Rohan and Aarav Julka in this matter. I have requested a complete written version of what occurred from my client and his parents, and statements of witnesses are being gathered. I have directed my clients to cooperate fully with the Oak Brook Police Department.

Please accept this message as further notice to you and your client that my office represents of Rohan and Aarav Julka in any and all matters pertaining to allegations of academic dishonesty; and as counsel for both children in any and all cases where one or both of the children are the alleged victims of any physical assault or battery. Accordingly, your client is placed on notice that they are forbidden from questioning, interrogating, or discussing any such matter with either child in any way without the express written authorization and permission of my office.

Thank you, and I will accept a copy of the School Board's decision as an email attachment. I will verify with your office the date on which I was provided a copy of the decision. If you have any questions, please feel free to contact me.

Regards,

CHRISTOPHER J. STULL
COUNSEL FOR ROHAN & AARAV JULKA, MINOR CHILDREN

Law Office of Christopher J. Stull
29W204 Roosevelt Road
West Chicago, IL 60185

April 26, 2016

Robbins Schwartz
55 W. Monroe St. Suite 800
Chicago, Illinois 60603-5144

Dear Ms. Roselli,

It is my understanding that a decision was made by the School Board in the Julka matter almost 2 weeks ago, and the parents sent me a copy of a letter they received dated April 15, 2016. I have not received a copy of the written decision of the School Board on the grievance filed by the parents. As the attorney for the children who represented them in the administrative hearing process, I would like to have a copy of the determination. I requested a copy from Libby Massey on Monday, April 25, 2016 but I have not received a copy or a response.

Generally, a party seeking to file an action for Judicial Review must do so with 35 days of the date of the administrative decision. As my office serves as counsel for the Julka children, I should have been provided with a copy of the decision, as the 35-day filing period for a complaint seeking Judicial Review will expire on May 20, 2016.

From my review of the Butler District 53 Policy, Chapter 1, Section 1400, Uniform Grievance Procedure, there is no provision for any administrative remedy after the School Board issues a decision on an appeal for the Superintendent's initial decision. It is my understanding that the School Board has in fact issued a ruling on the appeal filed by the parents to Heidi Wennstrom's initial decision dated February 8, 2016.

It appears that my clients have exhausted their available administrative remedies. If you are aware of another policy provision that provides for any kind of additional administrative remedy outside of this specific section, kindly so advise us so we can begin such a remedial process. Your office will be receiving from my office a formal written response to the Board's decision once we have a copy to review that will be requesting a new hearing before the Board.

On April 7, 2016 Libby Massey sent me an email informing me that you would be contacting me regarding my request that the Julka children not be interviewed, questioned, or otherwise communicated with directly regarding this matter without my being present. As your firm represents District 53 and has for at least the past several years, I presume such notification should be sent to your firm. I have previously done so on my letter to your firm as the attorneys for District 53 dated April 6, 2016.

Phone: 630.293.6659 • Fax: 630.293.2970 • email: christopher.stull@comcast.net

I received several messages this afternoon regarding an incident at the school involving Rohan Julka. I have been informed a teacher allegedly physically struck Rohan Julka.

A police report has been made, and I will again be representing Rohan and Aarav Julka in this matter. I have requested a complete written version of what occurred from my client and his parents, and statements of witnesses are being gathered. I have directed my clients to cooperate fully with the Oak Brook Police Department.

Please accept this message as further notice to you and your client that my office represents of Rohan and Aarav Julka in any and all matters pertaining to allegations of academic dishonesty; and as counsel for both children in any and all cases where one or both of the children are the alleged victims of any physical assault or battery. Accordingly, your client is placed on notice that they are forbidden from questioning, interrogating, or discussing any such matter with either child in any way without the express written authorization and permission of my office.

Thank you, and I will accept a copy of the School Board's decision as an email attachment. I will verify with your office the date on which I was provided a copy of the decision. If you have any questions, please feel free to contact me.

Regards,

CHRISTOPHER J. STULL
COUNSEL FOR ROHAN & AARAV JULKA, MINOR CHILDREN

contact me. Thank you for your cooperation.

Sincerely,

Dr. Heidi Wennstrom

This e-mail has been sent to you by BROOK FOREST SCHOOL. To maximize their communication with you, you may be receiving this e-mail in addition to a phone call with the same message. If you no longer wish to receive email notifications from BROOK FOREST SCHOOL, please click here to unsubscribe.

pdf

DOCS-#58...o_Stull.PDF

132 KB

EXHIBIT 50

Oak Brook Police Department Crime Report

Case No. **OP16008333**
Report No. **OP16008333.1**
Report Date: **4/28/2016**

Oak Brook Police Department
1200 Oak Brook Rd
Oak Brook, IL 60523
630 368-8701

1

Subject: **0460 - BATTERY**

Case Report Status: **A - Approved**
Occurred On (and Between): **4/27/2016 2:00:00 PM**
Location: **60 Regent DR- Brook Forest School**
Jurisdiction: **OB - Oakbrook PD**
Grid: **OB01 - ZONE 1**
Sector: **194V - 194V**
Map: **OB - OAK BROOK**
Census/Geo:
Call Source: **Telephone - UDT**

Date Entered: **4/28/2016 1:27:35 PM**
Entered By: **PP68 - Plinske, Paul**
Date Verified:
Verified By:
Date Approved: **4/28/2016 2:28:46 PM**
Approved By: **DJ27 - Jacobs, Doug**
Connecting Cases:
Disposition: **Active**
Clearance Reason:
Date of Clearance:
Reporting Agency: **Oak Brook Police Department**
Division: **Oakbrook**
Notified:

Reporting Officer: **PP68 - Plinske, Paul**
Assisted By:

Vehicle Activity:
Vehicle Traveling:
Cross Street:

Means:
Other Means:
Motive:
Other Motives:

Report Narrative

Juvenile Not for Publication

Battery
No Complaints to be signed

On 04/28/16 at about 1224 hours I responded to the Oak Brook Police department for a delayed battery report. Upon my arrival I spoke to the complainant who was identified as JULKA, ROHAN and his mother who was identified as JULKA, KOMAL.

ROHAN advised on 04/27/16 he was in his 5th grade classroom (Ms. Owen's Room) at Brook Forest School when he was struck by substitute teacher Ms. QUINN. ROHAN stated at about 1400 hours the class was getting ready to watch a film about the Boston Tea Party. ROHAN stated during the opening credits, he was attempting to finish the last word on his crossword puzzle when Ms. QUINN walked up to him and struck him on the right side of his head with the palm of her right hand. ROHAN stated Ms. QUINN had previously asked him to put the crossword puzzle away. ROHAN stated this caused a headache for "one minute". ROHAN stated he did not see the school nurse for his injury. ROHAN stated classmate [redacted] witnessed the incident. I asked KOMAL if she examined ROHAN's head when she saw him after school, and she advised she did, but did not feel any bumps or see any visible injury to the right side of ROHAN's head.

KOMAL stated she went back to the school and spoke to Principal VOLIVA and the Superintendent, asking what happened with her son and Ms. QUINN. KOMAL advised she granted permission for VOLIVA to speak to ROHAN during the next school day to determine what happened in the classroom on 04/27/16.

ROHAN stated he spoke to Principal VOLIVA, Ms. QUINN and Ms. WOLFF on 04/28/16. ROHAN stated VOLIVA accused him of lying and compared him to the story of the boy who cried wolf. ROHAN stated when he asked his friend [redacted] what he had told Principal VOLIVA, Ms. QUINN, and Ms. WOLF, he stated [redacted] told him they pressured him into saying ROHAN was lying about the incident. ROHAN stated he was very upset and when his mother brought him lunch on 04/28/16, he asked that she take him out of school for the day.

KOMAL advised she does not wish to pursue criminal charges.

KOMAL and ROHAN were advised that Officer Church #74 would follow up on this initial report.

I provided KOMAL with the report number and I returned to patrol.

Offense Detail: 0460 - BATTERY

Offense Description: **0460 - BATTERY**
IBR Code:
IBR Group:
Crime Against:
Using:

Criminal Activity:
Weapons/Force:

Location: **300 - SCHOOL**
Offense Completed?: **Yes**
Offense Status:
Hate/Bias: **88 - None (No Bias)**
Domestic Violence: **No**

No. Prem. Entered:
Entry Method:
Type Security:
Tools Used:

Gmail

komal julka <kjulka57@gmail.com>

Rohan's statement

Rahul Julka <rjulkamd@gmail.com> Fri, Apr 29, 2016 at 8:49 AM
To: Heidi Wennstrom <hwennstrom@butler53.com>, Kelly Voliva <kvoliva@butler53.com>
Cc: christopher.stull@comcast.net, komal julka <kjulka57@gmail.com>

Dr. Wennstrom and Mrs. Voliva,

I decided to write this email to you both in order to clarify a few things re: the events involving Rohan on Wednesday April 27th and Thursday April 28th.

First of all, it is my understanding that when Rohan was picked up after school on Wednesday April 27th, he reported to my wife that he had been struck by a substitute teacher at the school, Ms. Quinn. It is also my understanding that my wife came to the school that afternoon and asked to speak to Mrs. Voliva, at which time she entered Mrs. Voliva's office and spoke to both Mrs. Voliva and Dr. Wennstrom. My wife reported what Rohan had told her, and asked what had occurred to lead this to happen. I was told that Ms. Owen was called to the office, and that Ms. Quinn was called via telephone with my wife in the room. I was also told that Ms. Quinn's response to Dr. Wennstrom's questioning her about the incident was that she admitted to physically contacting Rohan but that she had just "ruffled" his hair, and her fingernail must have hit his head. After this, it is my understanding that my wife stated that Rohan had told her the names of two classmates that may have seen the incident, and she gave you these names. My wife left with Dr. Wennstrom telling her that the school would look further into the incident.

On Thursday April 28th, Rohan was brought to Mrs. Voliva's office, where he was questioned by Mrs. Voliva, Ms. Owen, Ms. Quinn, and Mrs. Wolfe for nearly an hour. Rohan's account to me is that he felt as if Mrs. Voliva was yelling at him and angry at him. Other points that he told me about re: the meeting:

1. Mrs. Voliva telling Rohan that Mrs. Quinn did not hit him, and she knew it.
2. Mrs. Voliva calling Rohan the "boy who cried wolf".
3. Mrs. Voliva repeatedly asking Rohan to hit her in order to show her how hard Ms. Quinn had hit him.
4. When asked, Rohan stating that he felt Ms. Quinn had struck him on purpose, not by accident.
5. Rohan didn't understand why he was being questioned as if he had done something wrong when all he did was report that he was hit on the head.
6. Mrs. Voliva telling Rohan that she didn't believe that he was hit that hard.
7. Mrs. Voliva telling Rohan that the other student who saw Ms. Quinn hit him said that the force of the hit was not that hard, and would not hurt a baby.
8. Rohan saying that maybe he is feeble, because the force of the hit hurt him.
9. Mrs. Voliva telling Rohan that if he is feeble, maybe he should be separated from the other children.
10. Mrs. Voliva telling Rohan she doesn't believe him, and that he is a cheater and liar.
11. Mrs. Voliva ending the questioning when Rohan started crying.
12. Rohan going to the school bathroom to continue crying.
13. Rohan asking my wife to take him home at lunch because he is upset, he thinks Mrs. Voliva hates him, and thinks he is a liar.
14. Rohan telling my wife that he will never tell her again if a teacher hits him at school.

After this meeting, it is my understanding that Rohan and my wife met with Ms. Owen, who recommended that Rohan write down his version of events how they happened. Rohan wrote down that Ms. Quinn had slapped him on the head. After doing this, Ms. Owen asked Rohan and my wife to wait for Dr. Wennstrom and Mrs. Voliva. Upon entering, Mrs. Voliva told my wife that there were contradictory reports from Rohan about the incident, whether he was slapped/punched/struck, etc. and that she didn't believe his version of events. Dr. Wennstrom asked my wife that Rohan said he was feeble, and is he on any medication. My wife stated that no, he is not on medication, he is a healthy child, and plays soccer. At this time, Dr. Wennstrom also began asking Rohan how hard he was hit, by asking him to demonstrate on the table. After he did so, she told him that did not seem that hard, and she took cell phone video of his striking the table. Dr. Wennstrom then proceeded to say that whatever Rohan was saying about Ms. Quinn is a serious offense, and it could make her lose her job and that she has been with the school for over 23 years. At this point, Rohan started crying again, saying that he didn't want to hurt anyone, that he likes Ms. Quinn, and he didn't want anyone to be fired. My wife told Dr. Wennstrom that by saying that Ms. Quinn would get fired, it would just pressure Rohan into writing something inaccurate to prevent hurting Ms. Quinn. Ms. Owen went to get Rohan a water bottle and Kleenex as he was still crying, in fear of hurting Ms. Quinn. My wife tried to calm him down, and told him to be be honest, state the facts only, stick to the truth, and not let the possibility of anyone getting hurt affect him. My wife told Rohan that neither she nor he was trying to get Ms. Quinn fired, and that he should not write anything down to protect anyone, just write the truth of what happened. Rohan was asked to rewrite his statement by

My wife and I are floored at these events. My wife went into the office on a neutral footing, simply asking what happened. She gave names of two children who Rohan said may be able to verify his story. One child reported that he did in fact see Ms. Quinn strike Rohan. Contradictory to Mrs. Voliva's statement to Rohan about what the other student said re: how hard Rohan was hit, that student told Rohan that he did not say that. That student also told Rohan that he was told by Mrs. Voliva that he must have talked with Rohan beforehand about what to say, and that the student actually showed Mrs. Voliva his cell phone log to prove he had not spoken to Rohan.

A child tells his parent that he was struck at school by a teacher, and that parent notifies the school to find out what happened. And the child is "put on trial" and accused of being a liar and the boy who cries wolf? When there is another student who verified that he saw the incident happen? When the teacher admitted that she made physical contact with the child? A significant amount of the questioning Rohan went through was concerning how hard he was struck, and asking him to demonstrate that. How can anyone, let alone an 11 year old child, strike an object with his hand and say, that is exactly how hard I was hit? And how can anyone expect an 11 year old to strike his principal in order to show how hard he was hit? It does not matter subjectively how hard the impact was; the point is that impact was made, and that should never happen. The use of different words like strike, slap, punch, hit, etc. is not "contradictory" stories; to an 11 year old boy, they all mean the same thing - there was some blow to the head. Rohan is 11 years old and is aware of the difference between "ruffling" of the hair and forceful contact.

Rohan has always been a bright, caring, respectful boy ever since birth. He always looks out for others, and has a sweet natured, loving personality. He has always excelled at his studies, and works tirelessly to get good grades, including being in the advanced math program. For a school official to throw in his face an incident from over a year and a half ago re: looking at another student's paper in Science class, and call him a cheater, is uncalled for and only serves to bring down all the work he has been doing to excel in his classes. He has been achieving straight A's in virtually every class, including Science, where he has gotten exemplary marks and comments from his science teacher, and was nominated for STEM National Youth Leadership Foundation this year by his science teacher.

We have noted a significant increase in times that Rohan has been called to the principal's office since January 2016. We can only assume that this is related to the National Geo Bee incident where Rohan was accused of academic dishonesty, but cleared by the school's own investigation. This is not the first time that we have been upset over the way that Mrs. Voliva has spoken to one of our children. What she feels is a "stern" voice as the principal of the school, is often seen as rude, confrontational, and yelling by others, particularly school aged children and their parents, and not just us. We feel that Rohan has been made to suffer by this incident by making him feel as if he did something wrong in reporting being struck by a teacher. We hope this does not happen again.

2 attachments

IMG_8218.JPG
1348K

IMG_8219.JPG
1296K

Gmail

komal julka <kjulka57@gmail.com>

Rohan's statement

Heidi Wennstrom <hwennstrom@butler53.com> Fri, Apr 29, 2016 at 9:30 PM
To: Rahul Julka <rjulkamd@gmail.com>
Cc: Kelly Voliva <kvoliva@butler53.com>, christopher.stull@comcast.net, komal julka <kjulka57@gmail.com>, Caroline Roselli <croselli@robbins-schwartz.com>

Dear Dr. Julka,

I am in receipt of your correspondence. I am not in agreement with many of the statements in your account of our meeting. I ask that any further correspondence related to this matter be sent to Ms. Roscelli and myself. We are unwilling to have any additional meetings or conversations with your wife related to this situation due to severe fact distortion and lack of faith that any positive partnership can be established. We are committed to fully investigating this matter and to cooperating with the authorities to complete a thorough and impartial investigation, the results of which will be communicated through email.

Sincerely,
Dr. Wennstrom

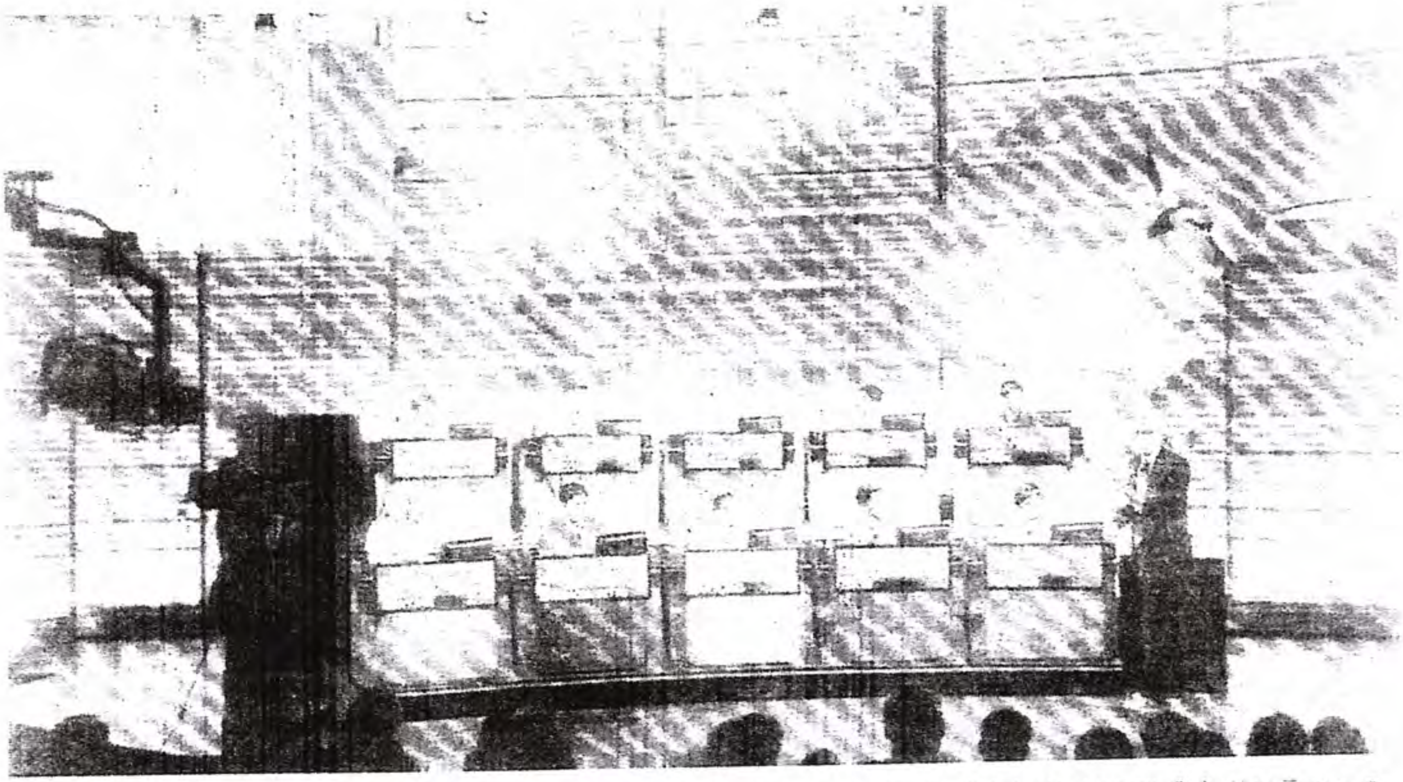
[Quoted text hidden]

<IMG_8218.JPG>

<IMG_8219.JPG>

EXHIBIT 51

Oak Brook dad sues after kids banned in 'GeoBee' scandal



Journalist and humorist Mo Rocca with the 10 National Geographic Bee finalists on May 25, 2016, in Washington, D.C. ([illegible])

Christy Gutowski · Contact Reporter
Chicago Tribune

[illegible]

The pressure to win national academic contests that test children on geography or spelling can be immense, especially with thousands in scholarship money on the line.

But administrators in a small Oak Brook school district allege parents in two families took their quest for victory way too far when they intentionally obtained test questions leading up to this year's National Geographic Bee.

The ensuing fallout led to a costly district investigation, sanctions against both families accused of cheating and an upcoming court battle.

The father of two students in one of the families has asked a DuPage County judge to weigh in on the procedures followed by Butler School District 53 and repeal sanctions that include banning his sons, ages 9 and 11, from all academic competitions while they remain in the district.

EXHIBIT 52

updated: 6/16/2016 9:38 PM

Oak Brook family suing school district over cheating scandal

Justin Kmitch

Butler Elementary District 53 school officials hope a mid-July court date sparks movement in a months-old cheating scandal that has plagued the district and an Oak Brook family.

A DuPage County judge is expected on July 18 to hear a lawsuit brought by a father over procedures officials used when sanctioning his 9- and 11-year-old sons who were accused of planning to cheat during this year's National Geographic Bee regional competition.

The boys were banned from all academic competitions in the district after officials accused their parents of intentionally purchasing and downloading test questions days before the Jan. 19 GeoBee at Brook Forest Elementary School.

Dr. Rahul Julka, a DuPage County surgeon, filed the lawsuit last month against school board members on behalf of his children. The lawsuit seeks to eliminate the sanctions and have letters and documents related to a district investigation into the parents removed from the boys' school files.

Neither the Julkas nor their attorney returned calls Thursday, but in their lawsuit they deny any wrongdoing.

According to district officials and exhibits attached to the 33-page lawsuit, a six-week investigation determined Julka's wife, Komal, registered as a "fraudulent" home school provider and paid for the questions with her credit card.

Administrators began receiving complaints Jan. 15 about Julka admitting to "jailbreaking" the geography bee system and gaining access to test questions. According to exhibits filed in the lawsuit, another parent claims to have twice urged the Julkas to remove their children from the competition, which they eventually did.

"When we became aware there might be two families who gained access, inappropriately so, to contest questions, we basically stopped and did a month-and-a-half investigation, during which all of the correct people were interviewed," board President Alan Hanzlik said Thursday. "When we were done, we had all the data we needed and it became clear to (Superintendent Heidi Wennstrom) that there was a definitive effort by two parents who did gain access and were intending to use that material to gain an advantage in the geography bee."

Hanzlik said the board immediately upheld the sanctions recommended by Wennstrom.

In an April 15 letter to the Julkas, administrators accused Komal Julka of contradicting herself when she first said she downloaded the test questions accidentally. According to court records, she also said she paid for what she thought was a study guide so an uncle could help the children prepare.

Komal Julka also is accused of providing the email account and password to the second family, whose child participated in the bee but was later disqualified and placed on similar sanctions. Hanzlik declined to comment regarding the second family, saying they have "not yet filed a lawsuit, so their information is not public."

Hanzlik called the lawsuit and the sanctions leading to it "an unfortunate but necessary path."

According to the lawsuit, both families requested and participated in administrative hearings that prompted an "independent review" by a district-hired attorney, who upheld the initial findings.

Hanzlik defended having the independent review conducted by the same law firm that represents the district.

"The independent investigator works within the law firm we work with that knows Illinois school law," he said. "So, yes, it's the same law firm, but the attorney who did the investigation is not at all associated with the attorney we work with."

Julka filed the lawsuit shortly after the review upheld the previous findings.

"Butler District 53 has an untarnished reputation as a very high performing district of 400 kids in kindergarten through eighth grade and we have zero tolerance for dishonesty," Hanzlik said. "The moment you turn your shoulder is the day you ruin that reputation that took decades to build."

Administrators included documents related to the investigation in the students' files. And their parents are prohibited from volunteering in academic competitions within the school system.

Hanzlik said there was a chance of imposing less strict sanctions, but the families showed no signs of remorse.

"We have conclusive proof there was intent to cheat by the parents and that children were prepped with that material," Hanzlik said. "Not once have these families acknowledged their wrongdoing or apologized for making a mistake. So we can't jeopardize the reputation of the school and the district by allowing them to participate in those kinds of contests."

Hanzlik also confirmed the district has spent more than $100,000 in legal fees and administrative time on the case.

"Believe me, there are much more important things we'd rather be spending that money on, but we just can't expose the district like that," he said.

Administrators acknowledged sending an email Wednesday to all district families outlining the upcoming court battle. The email, obtained by the Daily Herald, does not name the Julkas but says the district continues to receive complaints and multiple other requests requiring additional time and funds, including freedom of information act requests and the Julkas' lawsuit against the district.

"The Board of Education had hoped that the conclusion of the 2015-2016 school year would bring this matter to a close and the district and its teachers could again focus their attention to the education and mission of Butler 53," the email said. "However, the continued requests, complaints, lawsuits and threats of negative publicity from the involved families require ongoing attention from the (board and administration,)" the email states. "Though we cannot discuss specifics, the (board) is resolute in its obligation to protect Butler 53's reputation and will pursue every legal option available to stop this destructive behavior against our educational mission and, ultimately, property values within District 53."

Hanzlik said the district will release an additional statement Friday, once all board members have reviewed it.

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Comments
Daily Herald.
6/16/16

3 Comments

Sort by Oldest

Add a comment...

Suzanne G. Hiotke

There is good coming out of this story. I wanted to understand more about the issues involved, so I examined the National Geography Bee website. I found out that there are daily ten-question geography quizzes that anyone can take. I had my grandsons answer the questions for today's quiz, and we will continue to use this resource for learning and for fun. I recommend that other families check this out. If you, like our family, believe in lifelong learning, you will like it.

Like · Reply · 1 · Jun 16, 2016 [illegible]

Joelle Smart · Research Assistant at Oshima Lab, University of Washington

Have your grandchildren check out quizbowl, too! Loads of really good questions on all kinds of academic topics for free out there.

Like · Reply · 2 · Jun 16, 2016 10:27pm

Donald Ramsell · Owner at Ramsell & Associates, LLC

If it is true that these parents obtained these q and a's prior to the Bee, then they should be ashamed. Teaching children that stealing is just as good as earning is an example of how the moral fabric of society has declined. I sure hope that the Doctor didn't do the same thing in order to gain his medical degree and license.

Like · Reply · Jun 16, 2016 [illegible]

Komal Jaina · Chicago, Illinois

I'm sorry you are under the impression that in the United States a person is able to cheat their way into becoming a doctor (or Lawyer)

If you are interested in this story, and would like to hear the whole story and what really happened and how this so called "Investigation" by the school was really conducted and by whom, I belive we have a court date of July 18th. We hope that after the court and the public hear what we have to say - that we will prevail. But we request that inflammatory comments about my children or my family not be made. Our family is suffering enough by being portrayed in a negative light by the District making false and misleading comments through the media.

Thank you.

Like · Reply · [illegible] · Jun 18, 2016 [illegible]am · Edited

Rajani Patel

I can not believe the school spent $100,000 of tax payers money for this nonsense. The Board and Heidi Wennstorm should be accountable for this spending. If the courts and public side with the families, the Board and Heidi Wennstorm should pay for this cost, NOT the tax payers. Complete waste and abuse of tax payer dollars. Seems like a scandal on the school's part. TAX PAYERS SHOULD HAVE A SAY ON HOW THEIR MONEY IS BEING SPENT. DEMAND RECEIPTS AND TRY TO MAKE SURE THEY ARE NOT GETTING SOME SORT OF KICK BACKS. People work hard for their money!!! STOP ABUSING OUR MONEY IN WASTEFUL SPENDING.

Make the Board and Heidi Wennstorm pay for this expense - not the tax payers.

[illegible] · Chicago, Illinois

John P. Kelly,

Thank you for your interest. I would love to discuss more about this case with everyone who would be willing to listen. However, I feel that the school will only retaliate against my children. I could be wrong, but since we have not agreed to settle with the school (last week's offer) until they admit their wrong doing this is the letter I just received.

Good Afternoon Mrs. and Dr. Julka,

I am sorry to report to you I have recently discovered that incorrect placement letters were mailed to a few families from the Brook Forest Office.

As you know, Aarav has now qualified for ALP Math. However, I believe your family may have received a written letter from Mrs. Traub and me stating that he also qualified for ALP ELA (English Language Arts). This letter was sent in error and contains incorrect information. At this time, Aarav does not qualify for ALP ELA but does continue to qualify for math.

I highly regret that this clerical error occurred. We have now been able to rectify the problem. Please accept my sincere apology that this misinformation was sent to your family.

I'm wishing Aarav and the rest of the family a restful safe summer.

Warm regards,
Kelly
--
Mrs. Kelly Volive
Principal, Brook Forest Elementary
Director of Special Education, Butler School District 53

Now you tell me. How can you tell a child (10 years old) he did so well, and congratulate him, then tell him once he is looking forward to being in this class "sorry, the school made a mistake". Steve Harvey had a more sincere apology - that too to an adult.
I know my children will do well in life (whether or not they are in ALP - I was never in ALP and I did just **fine**).
To me, I don't care which class he is in, as long as the teacher is nice, the course challenges him, and he learns in the class (without having to hire tutors). But to me, this is abuse of power.
We have paid for a lawyer to not just protect our children and clear our name, but for the school to be fair to all the children. We have paid 1/10th the price for legal fees to prove my innocence and the innocence of my family (in which the school already admit in writing, to making a mistake). The school has power, backed up with a ton of tax payers unlimited funds. I wish there was a way to have Heidi Wennstrom pay for wasting tax payers money (my tax money as well) if we are able to prove our innocence.
If we lose this case, I lost money from my pockets, and the perception of myself and my family in the community.
The school really has nothing to loose. Its not their money at stake.
If they have this so called "conclusive proof" of anything - why are they playing games? Why do they need to have an unfair so - called "investigation". They could have hired anyone off the street to do a proper investigation and be fair.

And what exactly are they investigating, when we are the ones who pulled our children out from the competition, once we found out from another family, that the material we thought were study material, were the actual questions used at school. Our children didn't even participate. We emailed the school over the weekend letting them know that our children were not going to participate, as soon as the other family informed us that the questions we were sharing with everyone where infact the actual questions being used at school. If we were cheating - why in the world would we share the material with the the rest of all the children who would be competitors to our children. In the past we had clicked on homeschool to get study material (they were NOT the actual questions used by the school) they were simply study material. We shared that material with all the children and family members we knew. Never was an issue. I guess in the case of National Geo Bee, they give out the actual questions to all the parents who homeschool their children (never states that on their web page, nor have we ever won any such contest in the past to even know, we have only been in this district for 2 yrs). This whole thing about jail breaking is absouletly false, and inaccurate. One should go to jail if they jailbreak a website. I wouldn't even know how to do that!
As far as Heidi Wennstorm being forced to respond to our action and lawsuit - this could have all been avoided if the Districted wanted this issue to be resolved, and they can do so at anytime - all they have to do is the right thing based on what they know really happened.
I wish John, that I could explain more. But comment blogs are really not the place where I can prove myself. After spending a few million dollars moving to this district, I realize that our District is unfair and can also retaliate against our children (I'm not just talking about the ALP english letter - but a lot more) to adavance some previlaged ones. The only way I feel I can fix this issue is by going to court. We are not seeking monetary damages, but simply seeking the right and fair thing, with a FAIR hearing.

Like · Reply · [illegible]

[illegible]

I can not believe the school spent $100,000 of tax payers money for this nonsense. The Board and Heidi Wennstorm should be accountable for this spending. If the courts and public side with the families, the Board and Heidi Wennstorm should pay for this cost, NOT the tax payers. Complete waste and abuse of tax payer dollars. Seems like a scandal on the school's part. TAX PAYERS SHOULD HAVE A SAY ON HOW THEIR MONEY IS BEING SPENT. DEMAND RECEIPTS AND TRY TO MAKE SURE THEY ARE NOT GETTING SOME SORT OF KICK BACKS. People work hard for their money!!! STOP ABUSING OUR MONEY IN WASTEFUL SPENDING.
Make the Board and Heidi Wennstorm pay for this expense - not the tax payers.

Like · Reply · [illegible]

EXHIBIT 53

CAROL STREAM
IL 601
08 JUL '16
PM 9 L

A 10960324 133704
FOREVER

Rahul Julka
717 St Joseph Dr.
Oak Brook, IL
60523

great → teach your
son to Cheat!

...eoBee' ...nplaint

year, she did not believe it would show evidence of cheating. But when it did, the district acted decisively to safeguard its academic reputation, Wennstrom said.

"Academic dishonesty really casts a shadow on accomplishment done through hard work," she said.

Rahul Julka, a DuPage County surgeon, previously filed a civil complaint against the Board of Education of District 53 and board members on behalf of his children, ages 9 and 11, who also were banned from academic competitions. The complaint asked that a judge repeal the sanctions against the children.

A school district investi-

What are we teaching our children?

What a deplorable state of America's educational system to see two separate families in Du Page County sue Butler School District 53 because the school banned their children from competing in a vocabulary and geography contest. After a six-week investigation by the school board results showed that the parents engaged in "intentional academic dishonesty and unethical behavior" by "fraudulently" buying the vocabulary test and geography questions actually used in the competition and prepping their children with the correct answers.

Now the parents insist that a judge repeal the school's sanctions against their children!

One parent called the punishment "excessive, cruel and unjustified" and said her son "was penalized for knowing the correct answers." Another parent, a prominent gastroenterologist and surgeon, bragged about breaking into the online system to obtain the test questions and answers. Yet both sets of parents still deny any cheating or wrong doing.

What are we teaching our children?

CAROL STREAM IL 601

22 OCT 2016 PM 6 1

Dr and Mrs Rahul Naresh Jalka
98 Livery Court
Oak Brook, IL
60523

Gmail

komal julka <kjulka57@gmail.com>

Incorrect ELA Placement Letters Sent from BF School - Please Read

Kelly Voliva <kvoliva@butler53.com> Wed, Jun 22, 2016 at 4:03 PM
To: komal julka <Kjulka57@gmail.com>, Rahul Julka <rjulkamd@gmail.com>
Cc: Heidi Wennstrom <hwennstrom@butler53.com>

Good Afternoon Mrs. and Dr. Julka,

I am sorry to report to you I have recently discovered that incorrect placement letters were mailed to a few families from the Brook Forest Office.

As you know, Aarav has now qualified for ALP Math. However, I believe your family may have received a written letter from Mrs. Traub and me stating that he also qualified for ALP ELA (English Language Arts). This letter was sent in error and contains incorrect information. At this time, Aarav does not qualify for ALP ELA but does continue to qualify for math.

I highly regret that this clerical error occurred. We have now been able to rectify the problem. Please accept my sincere apology that this misinformation was sent to your family.

I'm wishing Aarav and the rest of the family a restful, safe summer.

Warm regards,
Kelly
--
Mrs. Kelly Voliva
Principal, Brook Forest Elementary
Director of Special Education, Butler School District 53

60 Regent Drive
Oak Brook, IL
630-325-6888 x7610

EXHIBIT 54

Gmail

..nportant Message from Butler 53 Board of Education

Butler School District 53 Administrative Center <vgalvin@butler53.com>
Reply-To: vgalvin@butler53.com
To: rjulkamd@gmail.com

Wed, Jun 15, 2016 at 1:20 PM

Dear Butler 53 Families:

Throughout its tenure this Board of Education has focused on enhancing the depth, breadth and quality of education at Butler 53. We have hired skilled and well regarded administrators and teachers, improved efficiency to internally fund capital projects, and negotiated fair labor contracts that are sustainable and transparent. We are continuously preparing for the future given great uncertainty with State funding, including the potential shift of pension costs to schools and historically low new tax revenue.

The reputation of District 53 is well known and our increasing enrollment over the last five years has demonstrated the high regard families place upon District 53. Both District 53 schools are nationally recognized recipients of the Blue Ribbon Award for Educational Excellence, a rare honor for any school district. We consistently rank among the very .op in State academic performance. All of this is to ensure our students receive a distinguished education that prepares them for their future, and to reinforce the Oak Brook community as a highly desirable location to raise a family.

Unfortunately, over the past five months the District 53 Administration and Board of Education has been pulled away from its primary mission in order to conduct intensive investigations and respond to ongoing complaints from two District 53 families related to the academic dishonesty findings against them earlier this year.

On February 8, 2016, a letter was issued to all District 53 families detailing an internal District investigation which revealed these families had engaged in academic dishonesty involving outside academic contests in which the District participates, specifically the National Geographic Bee and WordMasters Challenge. In order to ensure the integrity of District 53 achievement and contest results, the District promptly notified both organizations of the allegations and immediately initiated an internal investigation. At that time, the involved contests stated the District may continue to participate in the contests because they were immediately notified, received our full cooperation and were ensured appropriate actions were taken with regard to those involved. Based on the results of the District's internal investigation, appropriate and responsive action was taken.

Despite the thoroughness of the District's internal investigation, after the February 8, 2016 findings and sanctions were issued, the two involved families filed subsequent uniform grievance complaints with the District 53 Board of Education. Pursuant to Board of Education policy and procedure and in order to ensure due diligence and due process consistent with state and federal law, the District utilized an investigator from outside the District to conduct an independent review and investigation into the grievance complaints filed by the two families. This detailed investigation ultimately resulted in the Board of Education unanimously affirming the findings and sanctions previously issued to both families.

Now, however, the District continues to receive complaints and multiple other requests requiring additional time and District funds. These include: a motion to reconsider the Board's findings on the uniform grievance complaint, student .ecord challenges, administrative hearing requests regarding records, freedom of information act requests and a lawsuit against the District.

The Board of Education had hoped that the conclusion of the 2015-2016 school year would bring this matter to a close and the District and its teachers could again focus their attention to the education and mission of Butler 53. However, the continued requests, complaints, lawsuits and threats of negative publicity from the involved families require ongoing attention from the Board of Education and District Administration. The academic reputation of D53 is something that has been achieved by our families, students, teachers and administrators over many, many years. Though we cannot discuss specifics, the Board of Education is resolute in its obligation to protect Butler 53's reputation and will pursue every legal option available to stop this destructive behavior against our educational mission and, ultimately, property values within District 53.

Respectfully,

Butler 53 Board of Education

Dr. Heidi Wennstrom, Superintendent

Butler School District 53

Mission Statement

Butler School District 53 provides the best educational opportunities for each student

to achieve academic excellence, to develop the curiosity for life-long learning,

and to demonstrate personal and social integrity.

This e-mail has been sent to you by BUTLER SCHOOL DISTRICT 53. To maximize their communication with you, you may be receiving this e-mail in addition to a phone call with the same message. If you no longer wish to receive email notifications from BUTLER SCHOOL DISTRICT 53, please click here to unsubscribe.

EXHIBIT 55

From: Komal Julka kjulka57@gmail.com
Subject: Fwd: Rohan Julka
Date: Nov 2, 2016, 3:58:20 PM
To: Christopher Stull belgianbeer@comcast.net
Bcc: julkab55@gmail.com, doctorj47@aol.com, rppatel57@gmail.com, pateltrushar@gmail.com

Response to yesterday's incident - FYI

Sent from my iPhone

Begin forwarded message:

From: Rahul Julka <rjulkamd@gmail.com>
Date: November 2, 2016 at 3:46:46 PM CDT
To: komal julka <kjulka57@gmail.com>
Subject: Fwd: Rohan Julka

---------- Forwarded message ----------
From: **Amy F. Read** <aread@butler53.com>
Date: Wednesday, November 2, 2016
Subject: Rohan Julka
To: rjulkamd@gmail.com

Dr. Julka,
Thank you for expressing your concerns. I am aware of the situation and I am so sorry Rohan had this experience. Since the incident was reported yesterday, the following steps have been taken:

- A number of student witnesses were talked to yesterday as a way in which to gain a full understanding.
- All lunchroom supervisors were notified to be on high alert for any potential racist or derogatory comments being made during lunch.
- The student mentioned was addressed and will be monitored.
- Mrs. Marinier followed up with Rohan today to ensure he was feeling comfortable and to verify that the behavior had stopped.

Please continue to encourage Rohan to immediately report any concerns to us that he may have so that we can stay on top of this. Please know that our goal is to ensure a safe and positive learning environment for ALL of our students and behavior like this will not be tolerated.

If you have additional concerns or questions please let me know.

Amy F. Read
Principal

Butler Jr. High School
2801 York Road
Oak Brook, Illinois 60523
p: 630.573.2760 f: 630.573.1725

On Nov 2, 2016, at 9:52 AM, Rahul Julka <rjulkamd@gmail.com> wrote:

Hello Principal Read,

We wanted to write to you to inform you about an incident that occurred involving our son, Rohan, yesterday.

Rohan came home and told my wife and I about an issue that occurred at the lunch table yesterday. Rohan was eating lunch with three other boys when he was approached by Jason Kmoch, another 6th grade student.

This student walked up to Rohan and began insulting him by telling him that he cheated on the GeoBee exam last year, and began making up and singing songs about how Rohan is a cheater and how our family is a disgrace. He then proceeded to make racist, insensitive jokes about Indian physicians, and then apparently began making racist, insensitive jokes about Muslims and Guantanamo Bay. As if this was not enough, he then proceeded to call one boy at the table, who is Muslim, a terrorist. He then told Rohan that we as a family must be poor because Rohan was eating McDonald's.

Rohan went to Mr. Hamilton to report this behavior, and he recommended Rohan chat with Ms. Marinier. Rohan discussed with Ms. Marinier re: the incident and told her that this student was making insensitive/racist comments and ethnic slurs towards him.

As parents, we are appalled at this behavior by a student in the school towards our son. To us, school is to be a nurturing environment which fosters the educational process for a child, and allows them to be comfortable amongst their peers. Clearly, that is not the case with this child's attitude. We are also hearing that this is not the first time this child has expressed his views towards other minorities at the school. This kind of behavior can simply not be tolerated. We do not know what the plan is re:Rohan's discussion and reporting to Ms. Marinier about this child's behavior. We do not know if this issue has been raised by other students.

It is also clear from this child's comments about the GeoBee exam that our child is being affected by his peer group. Clearly Superintendent Wennstrom's decision to have repeated public letters and communications with the district families over a personal student disciplinary action resulted in parents discussing and involving their children regarding this matter. This has effectively blacklisted us in the district community and this has been moving down into the school environment for our son. Superintendent Wesnnstrom can say all she wants that no child's name was used, but anyone with knowledge of the district knows what a small community we live in and how easy it is to identify this so called anonymous family. We have not seen any public communications or letters to the district families regarding how Rohan was cleared of any wrongdoing by the district's own investigation.

Our number one goal was to have Rohan enjoy being in a non-toxic school environment this year. Unfortunately this child's actions have shown that we may have been unsuccessful.

Please advice us on what can be done about this child's behavior and keeping the school environment a happy one for Rohan.

Sincerely,

Rahul N. Julka, M.D.
Gastroenterology and Transplant Hepatology
Dalal Medical Corporation
5825 Broadway Suite B
Merrillville, IN 46410
219-981-9000

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Rahul N. Julka, M.D.